

**From:** [Gaskins, Farrah](#)  
**To:** [Les.H.Cleary@lmco.com](mailto:Les.H.Cleary@lmco.com)  
**Cc:** [Ullrich, Elizabeth](#)  
**Subject:** Request for additional information for License No. SUB-1502  
**Date:** Thursday, September 05, 2013 11:05:00 AM

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Dear Mr. Cleary,

This is in reference to your letter dated August 5, 2013 requesting to renew Nuclear Regulatory Commission License No. SUB-1502. In order to continue our review, we need the following additional information:

1. You requested to remove the Nickel 63 (Ni-63) sealed sources from your license. With your request, you provided documentation showing that the sources had either been expended or were transferred. In our telephone conversation on August 21, 2013, you indicated that the sources were transferred to another Lockheed Martin Facility. Please provide additional information showing that the sources were transferred to a site authorized to receive the sealed sources and documentation showing that the sources were received by that site.
2. You requested to remove the Americium 241 (Am-241) sealed source from your license. You stated in your letter that this material was on the NAVAL Permit No. 10-68733-B1NP and also provided a copy of the permit. As we discussed, please provide confirmation from the RSO, or other official, for that permit that the source is the same sealed source which at some point was also added to your license. The documentation should also confirm that Lockheed Martin Space Systems will continue to use the source under that Navy permit if future use is necessary.
3. In our telephone conversation, you mentioned that you wish to maintain the authorization for depleted uranium as shielding for your linear accelerator. Please provide the following information:
  - a. Please confirm the Radiation Safety Officer (RSO) and only authorized user (AU) will remain Leslie Cleary. Otherwise, please provide the name of the proposed RSO and any AU and information demonstrating that the proposed RSO and/or AU are qualified by training and experience.
  - b. Describe the facilities where licensed material will be used. Submit a description of the areas assigned as storage of the licensed material. Diagrams should be drawn to a specified scale, or dimensions should be indicated.
  - c. Please confirm that the depleted uranium will not be manipulated or removed from the device by the licensee (i.e. maintenance).
  - d. Please confirm that you will either perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 of that you will monitor individuals in accordance with the criteria set forth in NUREG-1556, Volume 7.

- e. Please commit to develop and maintain procedures for safe use and emergencies.
- f. You stated in our conversation that at some point in the future, you will be replacing the linear accelerator with one that will not utilize DU as the shielding material. Please confirm that you will either transfer the DU contained in your current device in accordance with requirements set forth in 10 CFR 40.51 (<http://www.nrc.gov/reading-rm/doc-collections/cfr/part040/part040-0051.html> ) or you will properly dispose of the DU in accordance with the regulations set forth in 10 CFR 20.201 (<http://www.nrc.gov/reading-rm/doc-collections/cfr/part020/part020-2001.html> ).

Guidance in NUREG 1556 Volume 7," Consolidated Guidance About Material Licenses: Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope". Section 8 and Appendix C of this guidance will be useful in helping you to formulate your responses to the requested information. The document can be accessed using the following link; <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7/> .

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 581493. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5143.

In order to continue prompt review of your application, we request that you submit your response to this email within 30 calendar days from the date of this email. Your response must be signed by a member of your management and either faxed (number provided below) or sent electronically as a pdf file.

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