

[Site Name]

[Address]

[Date]

[Reference #]

UNITED STATES NUCLEAR REGULATORY COMMISSION

Attention: Document Control Desk

Washington, DC 20555

References: (a) License No. xx

Subject: Request for Exemption from Specific 10 CFR 37 Requirements

Pursuant to 10 CFR 37, [Site] requests NRC approval of an exemption from specific requirements of 10 CFR 37, *"Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material"*. 10 CFR 37.11(a), *"The Commission may, upon application of any interested person or upon its own initiative, grant such exemptions from the requirements of the regulations in this part as it determines are authorized by law and will not endanger life or property or the common defense and security, and are otherwise in the public interest"*, allows the NRC to grant such exemption if within the law and not to the endangerment of life, property, or the common defense and security. [Site] believes the specific exemption of Large Equipment is not to the endangerment of life, property, or the common defense and security.

Large Equipment as it is defined for the purpose of this exemption includes equipment weighing in excess of 2,000 kg that does not contain either discrete sources or ion exchange resin.

Based upon their size and low specific activity, Large Equipment does not conform to the traditional definition of a Radiological Explosive Device component. These items are not easily attained or moved and in many cases require cranes, rigging and heavy equipment to become mobile and while in motion these items are not easily concealed. [The task time to implement theft or diversion of Large Equipment is beyond that which can reasonably be expected to be detected by Owner Controlled Area surveillance patrols conducted in accordance with the requirements of 10 CFR 73.55(h)(5)(ii).] These items should be considered as self-protecting based upon their size and weight. As stored within their current location existing Radiological Protection standards serve to protect personnel from accidental exposure through the use of posting, physical barriers and locking when conditions require.

Thank you in advance for consideration of our request. If you have any questions or require additional information, please contact me.

Sincerely,

Enclosure 1 provides the Environmental Assessment for the exemption request as required by 10 CFR 51.

[Site] requests approval of this exemption by [insert date] with the exemption effective upon issuance.

This submittal contains no new regulatory commitments or revisions to existing commitments.

If you have any questions or require additional information, please contact [contact info]

[Name]

[Title]

[Site]

[Phone Number]

CC's

DRAFT