



BioStorage Technologies, Inc.
2910 Fortune Circle West Suite E
Indianapolis, IN 46241

March 10, 2015

United States Nuclear Regulatory Commission/ Region III
Attn: Chief, Materials Licensing Branch
2443 Warrenville Road Suite 210
Lisle, Illinois 60532-4352

**RE: Amendment Request: Increase in C-14 Possession Limit
Byproduct Material License No. 13-32622-01 BioStorage Technologies, Inc.**

Dear Sirs:

Due to an expansion of our operations, **we request that our possession limit for Carbon-14 (C-14) be increased from our current level to a new limit of 200 millicuries.**

10 CFR 30.35 (a)(1) states that an applicant for a specific license authorizing the *possession and use* of unsealed byproduct material of half-life greater than 120 days and in quantities exceeding 10^5 times the applicable quantities set forth in appendix B to part 30 shall submit a decommissioning funding plan. We are aware that this threshold would normally be 100 millicuries for possession and use of Carbon-14.

We respectfully request a waiver for the requirement for a decommissioning funding plan for the increased possession limit, for the following reasons:

1. No changes in our present operations is planned.
2. Nearly all licensed materials are retained in a frozen state, stored for clients as part of stored biological samples. In this sense, the materials are not "used" as normally is implied by active research or clinical programs.
3. No materials are opened or used in any way that compromises their integrity during the storage period. In character and with regard to risk, they are essentially "sealed" sources.
4. Our operations have had a stellar inspection history during the 8 ½ years of active byproduct material storage. Regular contamination surveys of frozen storage areas have shown totally intact and uncontaminated environments, indistinguishable from the natural background.
5. In short, our materials stay put, in the freezers they are assigned, with no breach of their integrity. Our freezer complex has multiple layers of redundant, backup power and freezing mechanisms that make their inadvertent thawing highly unlikely.

If you have any questions, or need further information or documentation, do not hesitate to contact our Radiation Safety Officer, Thomas A. Schumacher, MS, CHP at (317) 902-9868, or radphysics@msn.com. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Swanberg".

Greg Swanberg, Chief Executive Officer

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