

February 23, 2016

Materials Licensing Section
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, STE 210
Lisle, Illinois 60532-4352

Attn: Cassandra F. Frazier

RE: License No. 24-00167-11
Docket No. 030-02271

Subject: Request to Change License Condition 21 E. (Amendment No. 87)

The purpose of this letter is to request that the NRC Materials License 24-00167-11, a Type A Broad Scope medical license issued to Washington University in St. Louis, be amended to change License Condition 21 E. in Amendment No. 87 to clarify notification expectations of that license condition. This license amendment request is being submitted to address concern raised by Mr. Robert Gattone during a routine NRC Inspection (January 25 – 29, 2016) that immediate notification can only be made to the Radiation Safety Officer and not to the Radiation Safety Staff.

We ask that NRC continue to manage Washington University's Broad Scope License application documents as not for public availability, and ask that you process this license amendment request in the same manner.

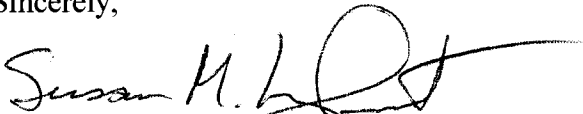
We request that License Condition 21 E in Amendment No. 87 of License No. 24-00167-11 be modified to clarify that notification may be made to the Radiation Safety Officer or to the Radiation Safety Staff as follows:

- E. If abnormal radiation levels or any malfunctions of the irradiator are detected at any time, the licensee shall cease using the irradiator, restrict access to the area housing the irradiator, immediately notify the Radiation Safety Officer or Radiation Safety Staff, and submit all reports required under 10 CFR Parts 20, 21 or 30.

The size and complexity of the University's licensed activities has required well-trained and experienced Radiation Safety Staff. Including me, the current thirteen Radiation Safety Staff include seven health physicists, two doctorates, three masters, two Certified Health Physicists with one more starting toward certification, and more than 203 years-experience in the University's Radiation Safety Office. The Radiation Safety responsibilities and duties described in Section BSL 7.3-2 of the University's broad scope license application have been described for the Radiation Safety Officer and Staff since the 2002 license renewal. We therefore want to modify the current License Condition 21 E to clarify that notification of the Radiation Safety Staff is also acceptable to meet this license condition.

I appreciate your prompt review of our license amendment application. Please contact me at (314) 362-2988 or at slanghorst@wustl.edu if you have any questions.

Sincerely,



Susan M. Langhorst, Ph.D., CHP
Radiation Safety Officer

Cc w/atts: Barry A. Siegel, M.D., Radiation Safety Committee Chairman
Bruce D. Backus, P.E., Environmental Health & Safety
Christopher W. Goddard, Associate General Counsel

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