



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

March 7, 2016

Docket No. 03031174
Control No. 589774

License No. 07-28386-01

Norman P. Lanier
Corporate Radiation Safety Officer
Tracerco
a business unit of Johnson Matthey, Inc.
4106 New West Drive
Pasadena, TX 77507

**SUBJECT: TRACERCO, REQUEST FOR ADDITIONAL INFORMATION CONCERNING
APPLICATION FOR RENEWAL OF LICENSE, CONTROL NO. 589774**

Dear Mr. Lanier:

This is in reference to your application dated December 17, 2015 requesting to renew Nuclear Regulatory Commission License No. 07-28386-01. In order to continue our review, we need the following additional information:

1. Your renewal application included a procedure for collecting leak test samples, but did not include a procedure for performing an analysis of the samples. Please submit your procedure for analysis of the leak test samples. If you select to have another person perform the leak test, please submit the name of the person and the applicable U.S. Nuclear Regulatory Commission or Agreement State license number.
2. 10 CFR 30.35 requires that licensees authorized to possess and use unsealed licensed material with a half-life greater than 120 days in quantities greater than those described in 10 CFR 30.35(d) must submit certification for financial assurance or a decommissioning funding plan (DFP) in any new or renewal application. Submit the required DFP and financial assurance or modify your licensing request such that financial assurance is not required.
3. In your application you requested to keep Condition 17 of your current license which allows transfer of byproduct material pursuant to 10 CFR 32.11. Currently, you have a new NRC license application for exempt distribution under review by the NRC, which if issued will take the place of Condition 17. Therefore Condition 17 will be removed from NRC License No. 07-28386-01. However, license Condition 17 will not be removed until the new NRC license for exempt distribution is issued.
4. In your application you requested a license condition authorizing environmental releases subject to the limitations of 10 CFR 20 Appendix B. License conditions are additional requirements not included in the regulations, with respect to the licensee's receipt, possession, use, and transfer of material. Authority is already granted in the

regulations, 10 CFR Part 20, for effluent release of materials as long as they do not exceed the values specified in appendix B to Part 20. Therefore a separate license condition is not necessary authorizing effluent releases. Please confirm that any effluent releases to unrestricted areas will not exceed the values specified in appendix B to 10 CFR Part 20.

5. Confirm that you are requesting to increase your possession limit for Krypton 83m from 1 millicurie to 1 curie.
6. Confirm you wish to remove possession of Iodine 131 from your license.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

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. 589774. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5399.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

Original signed by Stephen Hammann

Stephen Hammann
Senior Health Physicist
Decommissioning and Technical Support
Division of Nuclear Materials Safety

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