

From: Miller, John
To: Buschow, Ritchie D.
Cc: Wilson, Scott
Subject: RE: Questions/Corrections regarding License Amendment 49, NRC License no. 32-14048-04
Date: Tuesday, January 24, 2017 1:13:00 PM

Ritchie,

Thank you for your e-mail. I will respond to each of your comments.

1. This appears to be a typo. I will issue you a corrected copy so that Condition 12. reads clearly.
2. Leak test records now only need to be retained for 3 years as opposed to 5.
3. I believe your understanding is correct. You can remove an electron capture device from a gas chromatograph, however you can't remove a foil source from the electron capture device. If that is not clear, please give me a call.
4. You are still authorized to transport radioactive material in accordance with 10 Part 71. That authorization is now buried in the header of the license. 10 CFR 71 was previously not referenced in the license header.
- 5.

I hope these explanations are helpful.

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From: Buschow, Ritchie D. [mailto:Buschow.Ritchie@epa.gov]
Sent: Tuesday, January 24, 2017 11:12 AM
To: Miller, John <John.Miller@nrc.gov>
Cc: Baker, Todd <Baker.Todd@epa.gov>
Subject: [External_Sender] Questions/Corrections regarding License Amendment 49, NRC License no. 32-14048-04

Good Day Mr. Miller,

With reference to our recently issued license amendment #49 (License no. 32-14048-04), January 5, 2017, I have a few comments and/or potential corrections regarding this new amendment.

- 1) Under license condition 12., the previous license amendment 12. stated ".....the licensee shall further restrict the possession of unsealed byproduct material to quantities less than

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10E5....". Our new amendment states "...the licensee shall further restrict the possession of unsealed byproduct material 10E5....". Is this a typo error?

- 2) Under condition 17E. (leak test records retention period), the previous amendment stated that leak test records must be maintained for 5 years. The new amendment states leak test records only need to be maintained for 3 years. Is this change in retention time meant to be consistent with the current regulations?
- 3) Under Condition 18., whereas the previous amendment references "source holders", is this the same terminology that is now used in the current amendment (i.e., "detector cell")? In other words, removing source foils from the detector housing is the same as removing the foil from the detector cell?
- 4) Our new amendment 49 removes the previous amendment no. 48, condition no. 24., which authorized the transport of license material in accordance with the provisions of 10 CFR part 71, "Packaging and Transportation of Radioactive Material". This authorization has now been removed from our license. Was this done for a specific purpose or was it deemed no longer necessary to maintain this license condition?

Thank you and I look forward to receiving your response.

Ritchie Buschow, MEM, CLSO
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