

Eurofins
15 Research Park Drive
St. Charles, MO 63304

September 29, 2017

Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Re: NRC License #24-35149-01

Subject: NRC Response Mail Control No. 600608

Dear Mr. Tran:

Thank you for your timely response to our amendment request to add Building 6 to our radioactive material license. We are trying to start work in this new area by November 1, 2017.

The following information is provided in response to your request for additional information.

1. We confirm that only unsealed bound radioisotopes will be used.
2. I have corrected the sewage calculation sheet to reflect the correct Sulfur-35 regulatory limit. The corrected calculation document is attached. I entered the wrong amount in the spreadsheet. No S-35 has been discarded. The actual estimated amounts are still well below the regulatory limits. Our combined estimated amounts are still below the regulatory limits.

Thanks again for your support with this amendment request. If additional information is needed, please contact me at 815-370-6538 or jhatten@sahci.com.

Sincerely,



James Hatten
Radiation Safety Officer

Drain Disposal Calculation 2017 Sample

Data from Missouri American Water Bill used for water usage

Month	6
Nov to Apr Monthly Average	Gallons (1000s)
(1000 Gallons)	10
Months Avg ml	37854000
Monthly Allowed I-125 (uCi)	757
H-3 (uCi)	378540
C-14(uCi)	11356
S-35(uCi)	37854

Based on Total Used	I-125	H-3	C-14	S-35
2017 Planned Disposal %	0.85	0.05	0.05	0.05
2017 Planned Disposal uCi*	500	500	500	500

Monthly totals less than limit:	Yes	Yes	Yes	Yes
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Max disposal in any month	500	500	500	500
Actual Disposal uCi/ml	1.32086E-05	1.32086E-05	1.3209E-05	1.3209E-05
Monthly Reg Limit uCi/ml	0.00002	0.01	0.0003	0.001
Unity	6.60E-01	1.32E-03	4.40E-02	1.32E-02
Unity sum must be < 1	0.72			

*Sample used is maximum amount of 500uCi for each primary isotope.

*Amounts will be adjusted to account for other isotopes as needed.

RSO will approve all Sink disposals

RSO:

James C. Hatten

Tran, Frank

From: Jim Hatten <jhatten@sahci.com>
Sent: Friday, September 29, 2017 11:23 AM
To: Tran, Frank
Cc: Office SAHCI; Diane Werth; Jillian Krings; Jim Hatten
Subject: [External_Sender] Re: Request additional information for NRC License No. 24-35149-01 (Eurofins Scientific)
Attachments: 2017-09 Eurofin NRC resp.pdf

Mr. Tran

Response to your request is attached ref mail control no. 600608.

Thank you,

Jim Hatten

RSO, Eurofins

Mail Control No. 600608

On September 28, 2017 at 10:04 PM "Tran, Frank" <Frank.Tran@nrc.gov> wrote:

Dear Mr. Hatten:

We have reviewed the amendment request to add the location of use located at 6 Research Park Drive, St. Charles, Missouri, to your license. We will need the following information to complete our review.

- 1) Please confirm that all licensed materials will be unsealed bound.
- 2) In Item 11, "Waste Management", you listed the monthly concentration limit for disposing of sulfur-35 via sewer as 0.002 uCi/ml. Based on 10 CFR Part 20, Appendix B, Table 3, the monthly average concentration is 0.001 uCi/ml. Please provide an explanation.

Please provide a response in writing with an authorized signature by October 28, 2017. You could fax the response to 630-515-1078 or scan and email the response as a pdf to frank.tran@nrc.gov. In addition, please refer Mail Control No. 600608 in the cover letter

to facilitate proper handling in our office. If you have any questions please do not hesitate to contact me at 630-829-9623.

Thank you,

Frank Tran

Health Physicist/License Reviewer

NRC Region III/Division of Nuclear Materials Safety

Phone: 630-829-9623

Fax: 630-515-1078

Email: Frank.Tran@nrc.gov



James Hatten, SAHCI, Senior Health Physics Consultant

Office: 800-383-0468 Cell: 815-370-6538