

December 5, 2017

Alfred I. duPont Hospital for Children
License No. 07-16199-01
Docket No. 030-10568
Control No. 601353

Betsy Ullrich, Senior Health Physicist
USNRC Region 1
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406
Elizabeth.ullrich@nrc.gov

Dear Betsy,

Thank you for your review of our license amendment application. Please find our responses to your questions in italics below. I hope that this clarifies the processes that will be followed when we add the site at 200 Powder Mill Road to our license.

Additional information related to the request to perform licensed activities at the new location:

1. We do not usually issue multiple licenses for the same address because shared locations have resulted in confusion as to which licensee is responsible for licensed activities. As you may know, E. I. du Pont holds a Type A license of broad scope, License No. 07-13441-02, for the same address of 200 Powder Mill Road for activities at the DuPont Experimental Station. In order for us to authorize you to perform activities at the same address, we need to understand how your licensed activities will be maintained separately from those under the E. I. du Pont license.

- a. State which facilities, if any, will be shared by both licensees. Likely facilities may be laboratories, a receiving area, a waste storage area, an animal facility or other similar areas. Include areas which may require access of one licensee through the other; for example, if licensed materials need to be brought into the building on the first floor through an area controlled by E. I. DuPont in order to get the materials to the fourth floor area you are leasing. Describe which licensee will be responsible for shared facilities with respect to radiation safety activities and security.

A.I duPont (Nemours) is leasing all of floors 4 and 5 of building 400 and no laboratories or animal facilities will be shared with E.I DuPont. Isotopes will be received at 1600 Rockland Road and delivered directly to the facilities in building 400 according to DOT regulations by trained Nemours employees. All isotopes will be stored for decay in locked laboratories and disposal of radioactive waste is the responsibility of Nemours. There is no overlap in responsibilities of the two licenses.

- b. If facilities will not be shared, but both licensees will perform activities in the same building, describe how you will ensure that licensed materials and activities are kept separated.

E.I. DuPont is not using building 400 but other floors will be leased to other entities that may use

radioactive materials. Access to each floor is controlled by prox card access. In addition, isotopes are stored in locked rooms or are under direct control of Nemours employees at all times.

- c. Provide a letter or other documentation between you and E. I. DuPont clarifying responsibilities for licensed activities in the facilities you are leasing from them.

See correspondence between Robert Mason, Nemours RSO, and John Brisbin, E.I. DuPont RSO, attached.

2. Confirm if you have done a prospective dose evaluation to determine if extremity dosimetry will be used, considering the need to handle small animals containing the licensed materials during the various procedures.

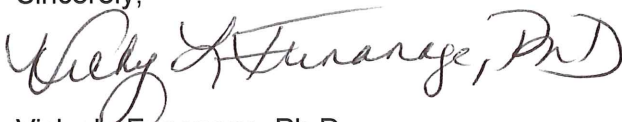
Although calculations indicate that maximum annual exposure of extremities will be significantly less than 4 rem for these studies, we require each user of F-18, Cu-64, and Zr-89 to wear a ring finger badge on each hand to monitor extremity exposure.

3. The information provided in Enclosure 8 regarding transportation of materials between you Rockland Road site and the Powder Mill Road address is not sufficient for a researcher to transport the material in accordance with DOT regulations and 10 CFR 71.5. Please confirm that any licensed materials will be transported in accordance with all applicable DOT regulations, including hazardous materials training, packaging requirements, radiation and contamination level limits, markings, labels, shipping papers, emergency response, and security. A recent summary of DOT requirements is attached.

The intention of the information in Enclosure 8 was to provide a summary of key issues of 10 CFR 71.5 that would be carried out. I confirm that any licensed materials will be transported in accordance with all applicable DOT regulations, including hazardous materials training, packaging requirements, radiation and contamination level limits, markings, labels, shipping papers, emergency response, and security. Only trained Nemours employees will be allowed to package and ship radioactive materials.

We hope we have answered your questions. If you require additional information, please do not hesitate to contact me.

Sincerely,



Vicky L. Funanage, Ph.D.
Operational Vice President, Research, Nemours Foundation
vfunanag@nemours.org

Cc: Robert W. Mason, Ph.D, Radiation Safety Officer
Department of Biomedical Research
Alfred I duPont Hospital for Children
rmason@nemours.org

From: [BRISBIN, JOHN M](#)
To: [Mason, Robert](#)
Subject: RE: Nemours NRC license
Date: Friday, December 01, 2017 2:06:17 PM

****This is an External Email - Please DO NOT open attachments or click links from unknown senders or unexpected email. ****

R.W. Mason, Nemours RSO,

I agree with your statements that all use of radioactive materials by Nemours users and authorized users is covered by the NRC license of Nemours and not the license issued to E. I. Dupont.

Sincerely,

John M. Brisbin

Radiation Safety Officer (RSO)
Environmental Compliance SHE Consultant
DuPont FS & RE
Experimental Station, E249/207
200 Powder Mill Road
PO Box 8352
Wilmington, DE 19803

Office: (302) 695-6896

Cell: (302) 420-2233

Fax: (302) 695-4032

Email: JOHN.M.BRISBIN@USA.dupont.com

[Radiation Safety SharePoint Site](#)

[FS&RE Environmental SharePoint Site](#)

Committed to Zero



From: Mason, Robert [mailto:Robert.Mason@nemours.org]

Sent: Wednesday, November 29, 2017 11:52 AM

To: BRISBIN, JOHN M <JOHN.M.BRISBIN@dupont.com>

Subject: [EXTERNAL] Nemours NRC license

This email is to confirm that Nemours is leasing floors 4 and 5 of building 400 at the duPont Experimental Station at 200 Powder Mill Road, Wilmington, DE 19803. Nemours is responsible for use of radioactive materials at this location under our NRC research license, 07-16199-01. This includes delivery and receipt of materials as well as disposal/decay. These activities will not be part of the E. I. Dupont Type A license of broad scope, License No. 07-13441-02, at the same address of 200 Powder Mill Road. All records will be kept

separate from those under the E. I. Dupont license. The Nemours licensee will be responsible for receipt of isotopes from commercial vendors and safety and security during transportation to the laboratories through any space shared by other entities. Radioactive materials will be secured in locked rooms that are only accessible to authorized users and users licensed by Nemours.

Please reply to this email to indicate your agreement that all use of radioactive materials by Nemours users and authorized users is covered by the NRC license of Nemours and not the license issued to E. I. Dupont.

Sincerely,

R.W. Mason, Nemours RSO

Robert W Mason, PhD
Radiation Safety Officer
Head of Clinical Biochemistry
Department of Biomedical Research
Alfred I duPont Hospital for Children
1600 Rockland Road Wilmington, DE 19803
Tel 302-651-6885
FAX 302-651-4827

email rmason@nemours.org

robmason@udel.edu

[Center for Pediatric Research.](#)

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