

**From:** [Lawyer, Dennis](#)  
**To:** [Malgorzata.e.kouretas.civ@mail.mil](mailto:Malgorzata.e.kouretas.civ@mail.mil)  
**Subject:** Department of the Army, Request for Additional Information Concerning Application for a License Amendment, Control 601500, Lic. No. SUB-348, Docket No. 04006377  
**Date:** Thursday, December 14, 2017 6:58:00 AM

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Dear Ms. Kouretas,

This is in reference to your letter dated October 24, 2017, requesting for approval of a survey plan and an amendment to Nuclear Regulatory Commission License No. SUB-348, Docket No. 04006377. In order to continue our review, we need the following additional information:

1. From your request, it appears that the building will be remodeled as office space, except for the Metallography Laboratory. To meet the alternate resuspension factor as given in NUREG-1720, Re-Evaluation of the Indoor Resuspension Factor for the Screening Analysis of the Building Occupancy Scenario for NRC's License Termination Rule, Draft Report, please confirm that the building and its rooms will have similar activities to light industrial use or less, that the ventilation in the building will be comparable ventilation to support light industrial, that surfaces went through cleaning or washing processes to ensure that contamination adheres to the building surfaces.
2. In section 1.3.3 of your survey plan, you state there is potentially contaminated Depleted Uranium (DU) asbestos containing floor tile under the sole plates in the DU room. Based upon the description, it appears this area is not open for surveying. Please state the status of this potentially DU and how it will be removed or surveyed to ensure it meets the release criteria.
3. In section 3.3, you state that you calculated the Derived Concentration Guideline Level (DCGL) as 2,240 disintegrations per minute/100 square centimeters utilizing DandD, Version 2.1. Please submit a copy of that calculation.
4. In section 4.7.1, it states that sections of epoxy will be removed to measure the existing floor. Most methods to remove the epoxy would cause further decontamination and may not reflect an accurate measurement of the remaining level of contamination on the floor. Please state how you will control or ensure an accurate reading of the floor that has epoxy covering the floor to ensure the DCGL is met.
5. In section 4.2, you state that sink drains, fume hoods, and ventilation in the Metallography Lab will be a class one survey. Please describe in detail how you would implement such a survey in these area.
6. In section 3.4.6, it states that you will use WRS Test or Sign Test. Based upon the amount of scoping surveys that have been performed, it would appear that one would have enough information to state which areas would need WRS test if any. Please provide more information on the need to perform WRS testing.
7. Please describe how you will pick random points for surveying. Also please provide maps and survey points associated with the proposed plan.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 601500. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 20 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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