

License: 53-00515-01
Docket: 030-06839
Control: 601657

Cook, Jackie

From: Blake Vance <BVance@harc-hspa.com>
Sent: Monday, February 19, 2018 8:30 PM
To: Cook, Jackie
Cc: Ronald Frick
Subject: [External_Sender] (Fwd) Re: REQUEST FOR ADDITIONAL INFORMATION FOR HAWAII AGRICULTURE RESEARCH CENTER LICENSE # 53-00515-01 DOCKET # 030-06839; C
Attachments: Attachment information; 18JanResponseToNRC.doc; Attachment information; 20Jul-25Sep'17Emails.doc; Attachment information; 17JulNotes.jpg; Attachment information; 17Jul20OutsideBarrels.jpg; Attachment information; 17Jul20Barrels.jpg; Attachment information; 17Sep1NRCnoteLicExp.pdf; Attachment information; 18May'14-20Jul'17Emails.doc

Hi Jackie,

I have attached my responses along with supporting documentation. I trust you will contact me if I have misunderstood your request or my response is lacking.

Best regards,
Blake

----- Forwarded message follows -----

From: Blake Vance <BVance@harc-hspa.com>
To: "Cook, Jackie" <Jackie.Cook@nrc.gov>
Subject: Re: REQUEST FOR ADDITIONAL INFORMATION FOR HAWAII AGRICULTURE RESEARCH CENTER LICENSE # 53-00515-01 DOCKET # 030-06839; CONTROL
Send reply to: BVance@harc-hspa.com
Date sent: Mon, 12 Feb 2018 12:21:21 -1000

Thank you!
Blake

On 12 Feb 2018 at 21:13, Cook, Jackie wrote:

From: "Cook, Jackie" <Jackie.Cook@nrc.gov>
To: "BVance@harc-hspa.com" <BVance@harc-hspa.com>
Copies to: "rfrick@gammacorp.com" <rfrick@gammacorp.com>
Subject: RE: Re: REQUEST FOR ADDITIONAL INFORMATION FOR HAWAII AGRICULTURE RESEARCH CENTER LICENSE # 53-00515-01 DOCKET # 030-06839; CONTROL
Date sent: Mon, 12 Feb 2018 21:13:28 +0000

Good Afternoon Mr. Vance: I will extend your due date to submit your response to my request for additional information until close of business Tuesday, February 20, 2018. Please note that Monday, February 19, 2018 is a Federal Holiday – Washington's Birthday (President's Day).

Enjoy the rest of your day!

Jackie

PUBLIC

☐ Immediate Release
☒ Normal Release

NON-PUBLIC

☐ A.3 Sensitive-Security Related
☐ A.7 Sensitive Internal
☐ Other:

Date: 2/21/18

601657

From: Blake Vance [mailto:BVance@harc-hspa.com]
Sent: Monday, February 12, 2018 1:07 PM
To: Cook, Jackie <Jackie.Cook@nrc.gov>
Cc: rfrick@gammacorp.com
Subject: [External_Sender] Re: REQUEST FOR ADDITIONAL
INFORMATION FOR HAWAII AGRICULTURE RESEARCH
CENTER LICENSE # 53-00515-01 DOCKET # 030-06839; CONTROL
Importance: High

Ms. Cook:

I request an additional week (until close of business on Monday, February 19, 2018) mainly to organize the requested information in item 2 of your 26 January 2018 email. I have checked with Mr. Ron Frick (HARC's RSO) and he feels we can provide acceptable answers to your inquiry within that timetable.

Your consideration of this request is appreciated.

Best regards,
Blake Vance

On 26 Jan 2018 at 21:37, Cook, Jackie wrote:

From: "Cook,
Jackie" <Jackie.Cook@nrc.gov >
To: Ronald Frick <rfrick@gammacorp.com>,
"BVance@harc-hspa.com"

<
BVance@harc-hspa.com>
Subject: REQUEST FOR ADDITIONAL INFORMATION
FOR HAWAII AGRICULTURE RESEARCH

CENT
ER LICENSE # 53-00515-01 DOCKET #
030-06839; CONTROL # 601657
Date sent: Fri, 26 Jan 2018
21:37:52 +0000

Mr. Vance and Mr. Frick:

Per our telephone conversation earlier today, please find attached a deficiency email requesting additional information by close of business on Monday, February 12, 2018. Please do not hesitate to contact me if additional time is needed to respond. In addition, please do not hesitate to contact me at the phone numbers and email address listed below if additional information or clarification is needed.

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

Respectfully submitted,

Ms. Jacqueline "Jackie" D. Cook
Senior Health Physicist
US Nuclear Regulatory Commission Region IV
Division of Nuclear Materials Safety
Nuclear Materials Safety Branch B
1600 East Lamar Blvd., Arlington, TX 76011
817-200-1132 (office)/817-200-1263 (fax)
Email address: Jackie.Cook@nrc.gov

----- End of forwarded message -----

Re Docket: 30-06839 and Control: 601657

Clarifications to your letter dated 26 January 2018 (note, your comments/questions were reproduced, followed by my responses in blue):

1. In looking at the program scope from the last inspection dated September 23, 2016 (NRC Form 591M Part 3), it appears that only small amounts of carbon-14 and tritium and in reviewing you[r] renewal letter dated June 30, 2015 inventory list, this material and exempt quantities of nickel-63 are in storage and in sealed steel drums ready for disposal.

Please note that your current license authorizes phosphorus-32, phosphorus-33, sulfur-35, and chromium-51 on your license in Items 6.A., 6.B., 6.E., and 6.F., respectively.

Please clarify this discrepancy.

Our current license (Amendment No. 73) allows for 50, 30, 29, and 10 millicuries of phosphorus-32, phosphorus-33, sulfur-35, and chromium-51, resp. Well over 10 half lives have elapsed since our last purchase of such material. Thus, HARC no longer possesses regulatable quantities of these materials.

2. Please submit a detailed description of all efforts made to dispose of the licensed material, including telephone calls, letters, facsimiles, personal contacts, etc.

See supporting documents: 1) 20Jul-25Sep'17Emails.doc (17JulNotes.jpg, 17Jul20OutsideBarrels.jpg, 17Jul20Barrels.jpg, 17Sep1NRCnoteLicExp.pdf), 2) 18May'14-20Jul'17Emails.doc

Note, usually files are named by the last2 digits of the year, month, day, descriptor; however, sometimes they are named as day, month, last 2 digits of the year, descriptor.

Personnel: 1) Dr. Mel Jackson (HARC RSO until 30 June 2017 when he left HARC); 2) Dr. Blake Vance (HARC Asst. Director); 3) Mr. Ron Frick (Gamma Corp., former HARC RSO, approved as HARC RSO per Amendment No. 73); 4) Dr. Heather McCafferty (HARC authorized user who had assisted with packing the material to be disposed, no longer a HARC employee); 5) Dr. Ming-Li Wang (HARC authorized user who had assisted with packing the material to be disposed); 6) Rich Gallego (Thomas Gray and Associates, Inc.); 7) Jason C. Dykert (Health Physicist, Inspection Branch, US NRC, Region IV).

3. Please note that in Item 3 of your renewal application dated October 31, 2017, you listed the location of storage authorized in Condition 10.A. of your license; however, currently your license authorizes another storage location in Condition 10.B. of your license.

In addition, please note that in the program scope from your routine inspection on July 18, 2013 (NRC Form 591M Part 3), the storage location in Condition 10.B. of your license is described as where you have 6 drums of radioactive waste and a trash compactor that is contaminated which you have packaged for disposal.

Please clarify this discrepancy.

In 2006, HARC purchased a 108-acre parcel in Kunia which it had leased for the previous half century. The general address of HARC's R&D agriculture parcel in Kunia is described in Condition 10.A. Upon taking ownership, it began to relocate its operation from Aiea to Kunia in a 2-step

601657

process. The first step involved setting up its Chemistry lab (including chromatograph with sealed source Ni-63 electron capture detector (ECD)) in a pre-existing building, the Multi-Purpose Building (MPB, aka Bldg. B). Construction was initiated on a biotech lab where the certificate of occupancy was issued upon completion in 2009. Therein, 6 drums of radioactive waste and a trash compactor are now stored in a locked inner room of the lab (Bldg. A). It appears the discrepancy stems from not having removed Item 10.B in amendment #71.

From: Ronald Frick <rfrick@gammacorp.com>
Date sent: Tue, 30 Jan 2018 10:30:07 -1000
Subject: Locations of use
To: "bvance@harc-hspa.com" <BVance@harc-hspa.com>

Hi Blake,

I was looking back at the old applications to figure out what the two different locations of use were listed in item 10.

Item 10.B (described as building 250 yards down road on left) had been added first when you had transferred the Ni-63 out to Kunia. This was added in Amendment #67.

Item 10.A is the lab where the drums are currently stored, and that was added in Amendment #68.

In amendment #69, we had requested addition of the storage trailer, but amendment #69 doesn't actually list any unique locations in addition to the ones listed in #68.

In Amendment #71, you requested removal of Ni-63 from the license, and removal of the "Chemistry instrumentation room in Building B at Kunia Substation". I am assuming this is the same building as is listed in Item 10.B of the license? I think Item 10.B should have been removed in amendment #71, but maybe there was confusion if Building B is the same location referred to in Item 10 B of the license.

Ron

From: Ronald Frick <rfrick@gammacorp.com>
Date sent: Fri, 2 Feb 2018 10:20:21 -1000
Subject: Re: (Fwd) Zip Code for Condition 10.B. on your license Hawaii
Agriculture Research Center (License # 53-00515-01)
To: "bvance@harc-hspa.com" <BVance@harc-hspa.com>

Blake,

Form 591M is the form they use for inspection results. Part 1 is given to the licensee, and part 3 has notes that are made by the inspector which would have details on the scope of the program, storage locations, people they spoke to during the inspection, etc. They don't release that information to the public. In her questions, Jackie refers to the inspection in July 2013, which would have been just after Amendment #71 was issued to remove Ni-63 from the license. Unfortunately that amendment didn't remove location 10B wfrom the license, but I assume all the ECD's were gone by July 2013. I can only assume that the inspector copied the locations that were listed on your license into her notes, even though that location wasn't being used anymore. I would let Jackie know what Amendment #71 removed authorization for Ni-63, and that location 10B should have been removed at that time. In the cover letter for amendment 71, it states that the amendment "authorizes the release for unrestricted use of the Chemistry instrumentation room in Building B at the HARK Kunia Substation in accordance with 10 CFR 20.1402, "Radiological criteria for unrestricted use" but that item wasn't removed from the license. Amendment 71 and the cover letter at attached.

Ron

4. Please describe an acceptable accountability program for assuring that the licensed material remains in secure storage and is not used (inventory at least annually). The program provides reasonable assurance that the licensee will maintain security.

Accountability Program: In an effort to comply with the above suggestion, HARC requests that the following Accountability Program be approved – the licensed material will continue to be stored in its current location, a locked room, which is not used for any other purpose. To reduce exposure and undue handling, the contents of the 6 drums will not be inventoried annually; rather, each drum will be labeled by a unique number, certification date, and signature of the certifying authorized user of HARC or HARC's RSO. A seal will be applied such that the contents of the drum cannot be accessed without detection. Only if the seal has been compromised, will the contents of the drum be inventoried. Various seals are under evaluation.

5. Please describe all planned changes to limit/decrease the licensee's radiation safety program as a result of placing the licensed material in storage. These changes may include, but are not limited to, the following:
 - A. Dosimetry services – Not applicable
 - B. Worker training programs – the Accountability Program will be explained to those concerned.
 - C. Instrument calibration service - Not applicable
 - D. Inventories – if the tamper-proof seal of any drum indicates it has been compromised, the contents of that drum will be inventoried to ascertain its contents for comparison with the last inventory of that drum.
 - E. Internal audits – Annual check of drums to determine if an inventory is required.
 - F. Maintenance and visual inspection of equipment and facilities – to be conducted annually
 - G. Maintenance of records – records will be maintained per the requirements of NRC.

6. If applicable, describe a commitment to leak test sealed sources and devices containing sealed sources at least once every 10 years and within 6 months before use or transfer to an authorized recipient.

This is no longer applicable since we disposed of/transferred the sealed Ni-63 electron-capture detector (ECD).

7. Please commit: "The licensee will continue to take all actions within its ability to dispose of its material and notify NRC within 30 days if disposal is achieved."

HARC (the Licensee) makes the following commitment: "The licensee will continue to take all

checked using Rion RSD 8135Q meter. Results faxed to me.
Jackson. Originals left in room. Mnt.

10/29/14 Manual for Beckman LS6500 Scintillation counter - wipe test
performed in order to be removed from hot room. All clear.
Material returned to hot room same day. Mnt.

12/31/14 Wipe test at Kunita. Forward recovery message again on Scintillation
counter. Error 5-1 times between 9:30am and 11:30am. Readings
look OK. All clear. Papers checked using Rion RSD 8135Q meter.
Results faxed to Mel Jackson + originals left in room. Mnt.

1/22/15 Wipe test at Kunita attempted but scintillation counter not working.
4 samples prepared but not able to access menu to run machine.
Will try again February. Mnt?

6/14/16 going through waste material in storage drums 1-6 and
item 7. picked waste removed. Entries catalogued Mnt.
Wipe test on outside of drums and sealing rings. Mnt.
Wipes done but no spectral scintillation counter on site to do
analysis. Mnt. Mnt.

Discard Scintillation Fluid Emeraldite from 15 trays
of plastic vials down the drain. Wrap ~~the~~ trays in
empty vials in plastic bag. Mel Mnt



On 20 Jul 2017 at 9:58, rfrick@gammacorp.com wrote:

From: Blake Vance <BVance@harc-hspa.com>
To: rfrick@gammacorp.com
Subject: (Fwd) Re: waste shipment
Send reply to: BVance@harc-hspa.com
Date sent: Thu, 20 Jul 2017 09:58:27 -1000

Hi Ron,
Here's the email thread with Rich at TGA.
Blake

----- Forwarded message follows -----

From: Blake Vance <BVance@harc-hspa.com>
To: "Richard Gallego" <rich@tgainc.com>
Subject: Re: waste shipment
Send reply to: BVance@harc-hspa.com
Date sent: Mon, 13 Jun 2016 11:04:58 -1000

Thanks!
Blake

On 13 Jun 2016 at 13:26, Richard Gallego wrote:

From: "Richard Gallego" <rich@tgainc.com>
To: <BVance@harc-hspa.com>
Subject: RE: (Fwd) (Fwd) RE: waste shipment
Date sent: Mon, 13 Jun 2016 13:26:27 -0700

Ivan Ako
Cell Phone: 425.753.6673
eMail: ikaika1958@gmail.com

-----Original Message-----

From: Richard Gallego [mailto:rich@tgainc.com]
Sent: Monday, June 13, 2016 1:21 PM
To: 'BVance@harc-hspa.com'
Subject: RE: (Fwd) (Fwd) RE: waste shipment

-----Original Message-----

From: Blake Vance [mailto:BVance@harc-hspa.com]
Sent: Monday, June 13, 2016 10:33 AM
To: 'Richard Gallego'
Subject: (Fwd) (Fwd) RE: waste shipment

601657

Hi Richard,

I received a temporary message delivery error upon sending the message below, so I thought I better resend it.

Blake

----- Forwarded message follows -----

From: Blake Vance <BVance@harc-hspa.com>
To: "Richard Gallego" <rich@tgainc.com>
Subject: (Fwd) RE: waste shipment
Send reply to: BVance@harc-hspa.com
Date sent: Mon, 13 Jun 2016 02:05:29 -1000

Richard,

You may recognize my email address as Mel has copied me on at least some of the emails that he has exchanged with you. I am the Assistant Director and will be taking over this waste shipment.

If there are more recent versions of the NSSI profile forms that you sent on 26 June 2015 (attached), please send them to me as well as any other changes in requirements for us to send both radioactive and mixed wastes to Thomas Gray & Associates.

My most immediate question is whether we must separate the mixed waste from the radioactive waste.

Thank you for your assistance,
Blake Vance

Blake Vance, Ph.D.
Assistant Director
Hawaii Agriculture Research Center (HARC) PO Box 100, Kunia, HI
96759-0100
808-621-1201 (Voice), 808-621-1399 (FAX) <http://www.harc-hspa.com>

----- Forwarded message follows -----

From: "Mel Jackson" <mjackson@harc-hspa.com>
To: "Richard Gallego" <rich@tgainc.com>
Copies to: <BVance@harc-hspa.com>,
<smay@tgainc.com>
Subject: RE: waste shipment

Date sent: Mon, 29 Jun 2015 08:44:20 -1000

HI Richard,

This looks like it could be quite a bit of work and time before I
can
ship
and seems like this may take longer than 90 days to complete and
ship
off
site?. It is 17 years since we last shipped material with you. Can
you
please provide recommended contact person details for State of
Washington
Site Use Permit and the contact person for the US Ecology generation
registration number. We have neither of these.

Many thanks,

Mel Jackson
Mel C. Jackson, Ph.D.
Director of Product Development and Services Hawaii Agriculture
Research
Center, P.O. Box 100, Kunia, HI 96759

Office | 808.621.1383
Fax | 808.677.2312
mjackson@harc-hspa.com

For Fedex and UPS Deliveries:
Hawaii Agriculture Research
94-340 Kunia Rd.,
Building B
Waipahu, HI 96797.

Tel: (808) 621 1383

CONFIDENTIALITY NOTICE

This message (including any attachments) contains information that
may
be
confidential. Unless you are the intended recipient (or authorized
to
receive for the intended recipient), you may not read, print,
retain,
use,
copy, distribute or disclose to anyone the message or any
information
contained in the message. If you have received the message in error,

please
advise the sender by reply e-mail, and destroy all copies of the
original
message (including any attachments).

-----Original Message-----

From: Richard Gallego [mailto:rich@tgainc.com]
Sent: Friday, June 26, 2015 9:10 AM
To: 'Mel Jackson'
Cc: BVance@harc-hspa.com; smay@tgainc.com
Subject: RE: waste shipment

Hi Mel,

I reviewed your inventory and it appears that you have some mixed
waste,
which will need to be described in the attached profiles. Also,
there
are a
few items on your list that do not include isotope and activity, and
without
that information, we cannot ship or receive your waste. I've
attached
NSSI
profile forms. All mixed waste (rad and RCRA hazards) must be listed
on
these forms before I can accept or quote your waste streams.
Additionally,
I'll need proof that you have a valid, unencumbered State of
Washington site
use permit and US Ecology generator registration number before we
can
accept
your waste. Please call with any questions that you may have.

Best regards,

Rich Gallego
Thomas Gray and Associates, Inc

-----Original Message-----

From: Mel Jackson [mailto:mjackson@harc-hspa.com]
Sent: Friday, June 26, 2015 6:11 AM
To: 'Richard Gallego'
Cc: BVance@harc-hspa.com
Subject: RE: waste shipment

Hi Rich,

I have the option to notify the NRC on June 30th that we do not intend to renew our NRC license. That gives us 90 days from that to submit a decommissioning report. I therefore would like to know whether once I file the notice to terminate the license, can you deal with our waste shipment and have it off our license and out of State by the end of September 2015? The inventory of material to be shipped is as I sent you previously. Please let me know whether this timeline will work before June 30th, as I would have to pay to renew our license for another year if this timeline cannot be met.

Best regards,
Mel Jackson

Mel C. Jackson, Ph.D.
Director of Product Development and Services Hawaii Agriculture Research
Center, P.O. Box 100, Kunia, HI 96759

Office | 808.621.1383
Fax | 808.677.2312
mjackson@harc-hspa.com

For Fedex and UPS Deliveries:
Hawaii Agriculture Research
94-340 Kunia Rd.,
Building B
Waipahu, HI 96797.

Tel: (808) 621 1383

CONFIDENTIALITY NOTICE

This message (including any attachments) contains information that may be confidential. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not read, print, retain, use, copy, distribute or disclose to anyone the message or any information contained in the message. If you have received the message in error,

please
advise the sender by reply e-mail, and destroy all copies of the
original
message (including any attachments).

-----Original Message-----

From: Richard Gallego [mailto:rich@tgainc.com]
Sent: Friday, May 29, 2015 6:54 AM
To: 'Mel Jackson'
Cc: BVance@harc-hspa.com; rfrick@gammacorp.com
Subject: RE: waste shipment

Hi Mel,

No timeline, I just was working through my pending jobs file and
wondered if
I should keep the info. Looks like the answer to that is yes!

Thank you,

Rich

-----Original Message-----

From: Mel Jackson [mailto:mjackson@harc-hspa.com]
Sent: Wednesday, May 27, 2015 4:39 PM
To: 'Richard Gallego'
Cc: BVance@harc-hspa.com; rfrick@gammacorp.com
Subject: RE: waste shipment

Hi Rich,

Yes it is! I have not had time to go through and segregate into
liquid and
solids. Is there a timeline you are looking at?

Mel.

-----Original Message-----

From: Richard Gallego [mailto:rich@tgainc.com]
Sent: Friday, May 22, 2015 3:48 PM
To: mjackson@harc-hspa.com
Cc: BVance@harc-hspa.com; rfrick@gammacorp.com
Subject: RE: waste shipment

Hi Mel,

Is this shipment still a possibility?

Thank you,

Rich Gallego
Thomas Gray and Associates, Inc

-----Original Message-----

From: Mel C. Jackson [mailto:mjackson@harc-hspa.com]
Sent: Wednesday, May 14, 2014 1:16 PM
To: rich@tgainc.com
Cc: BVance@harc-hspa.com; rfrick@gammacorp.com;
rfrick@gammacorp.com
Subject: waste shipment

Hi Rich,

Thank you for taking my call today. I have attached a spreadsheet showing our current inventory. We will endeavor to segregate the waste into liquid and solids in the next week or so, as you have instructed. Please get back to me after you have looked at the spreadsheet and then we can discuss next steps and a costing for the disposal.

Many thanks,

Mel.

Mel C. Jackson, Ph.D.
Director of Product Development and Services Hawaii Agriculture Research
Center, P.O. Box 100, Kunia, HI 96759

Office | 808.621.1383
Fax | 808.677.2312
mjackson@harc-hspa.com

For Fedex and UPS Deliveries:
Hawaii Agriculture Research
94-340 Kunia Rd.,
Building B
Waipahu, HI 96797.

Tel: (808) 621 1383

CONFIDENTIALITY NOTICE

This message (including any attachments) contains information that may be confidential. Unless you are the intended recipient (or authorized

to
receive for the intended recipient), you may not read, print,
retain,
use,
copy, distribute or disclose to anyone the message or any
information
contained in the message. If you have received the message in error,
please
advise the sender by reply e-mail, and destroy all copies of the
original
message (including any attachments).

----- End of forwarded message -----

Attachments:

C:\Users\Blake\Documents\SAFETY\RAD-SAFE\NSSIChemwasteprofi
leForm.pdf

C:\Users\Blake\Documents\SAFETY\RAD-SAFE\NSSIRadwasteprofile
form.pdf

----- End of forwarded message -----

No virus found in this message.
Checked by AVG - www.avg.com
Version: 2016.0.7639 / Virus Database: 4604/12413 - Release Date:
06/13/16

----- End of forwarded message -----

On 25 Sep 2017 at 13:40, rfrick@gammacorp.com wrote:

From: Blake Vance <BVance@harc-hspa.com>
To: rfrick@gammacorp.com
Subject: (Fwd) (Fwd) (Fwd) (Fwd) Pics for Visual
Copies to: Jason.Dykert@nrc.gov
Send reply to: BVance@harc-hspa.com
Date sent: Mon, 25 Sep 2017 13:40:31 -1000

Hi Ron,

I am very concerned about the 30-day prior-to-expiration requirement to renew our license. I haven't heard from you since our 19 July 2017 phone conversation. Please give me an update.

Thanks,
Blake

----- Forwarded message follows -----

From: Blake Vance <BVance@harc-hspa.com>
To: rfrick@gammacorp.com
Subject: (Fwd) (Fwd) (Fwd) Pics for Visual
Copies to: jnakasone@gammacorp.com
Send reply to: BVance@harc-hspa.com
Date sent: Tue, 05 Sep 2017 14:05:31 -1000

Hi Ron,
Rec'd the attached today.
Blake

----- Forwarded message follows -----

From: Blake Vance <BVance@harc-hspa.com>
To: rfrick@gammacorp.com
Subject: (Fwd) (Fwd) Pics for Visual
Send reply to: BVance@harc-hspa.com
Date sent: Wed, 30 Aug 2017 11:18:04 -1000

Hi Ron,

Please give me an update on where you are.

Thanks,
Blake

----- Forwarded message follows -----

From: Blake Vance <BVance@harc-hspa.com>
To: rfrick@gammacorp.com
Subject: (Fwd) Pics for Visual
Send reply to: BVance@harc-hspa.com
Date sent: Tue, 01 Aug 2017 17:22:38 -1000

Hi Ron,

601657

I assume you received the 3 emails I sent you on 20 July (pics, correspondence with Richard Gallego/TGA, and NRC Form 314) plus the email I bounced from Ming-Li about our LS supplies. Pls. let me know if there is additional information you need to provide an estimate to terminate our NRC license.

Thanks,
Blake

----- Forwarded message follows -----

From: Blake Vance <BVance@harc-hspa.com>
To: rfrick@gammacorp.com
Subject: Pics for Visual
Send reply to: BVance@harc-hspa.com
Date sent: Thu, 20 Jul 2017 13:36:38 -1000

Hi Ron,

Attached are some pictures to give you a better idea of the situation.

Blake

Attachments:

C:\Users\Blake\Documents\SAFETY\RAD-SAFE\17Jul20Barrels.jpg
C:\Users\Blake\Documents\SAFETY\RAD-SAFE\17Jul20OutsideBarrels.jpg
C:\Users\Blake\Documents\SAFETY\RAD-SAFE\17JulNotes.jpg

----- End of forwarded message -----

----- End of forwarded message -----

----- End of forwarded message -----

Attachments: C:\Users\Blake\Documents\SAFETY\RAD-SAFE\17Sep1NRCnoteLicExp.pdf

----- End of forwarded message -----



Rec'd 5 Sept 2017



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

September 1, 2017

Hawaii Agriculture Research Center
ATTN: Stephanie Whalen
P.O. Box 100
Kunia, HI 96759

Re: License No. 53-00515-01

SUBJECT: NOTICE OF LICENSE EXPIRATION

Your U.S. Nuclear Regulatory Commission (NRC) license will expire within the next 2 months. If you wish to continue your licensed program, you should prepare and submit a renewal application on NRC Form 313 (Enclosure 1), following regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) and licensing guidance in NUREG-1556, "Consolidated Guidance About Materials Licenses."

You must submit an application for the renewal of your license at least 30 days before the expiration date on the license.

If you do not wish to renew your license, you must dispose of or transfer all licensed radioactive material in your possession in accordance with 10 CFR 30, 40 and 70. Then complete the enclosed Form NRC-314, "A Certificate of Disposition of Materials" (Enclosure 2) and return it before the expiration date of your license, with a request that your license be terminated. If you have already applied for timely renewal of your materials license, please disregard this letter."

Sincerely,

Materials Safety Licensing Branch
Division of Material Safety, State, Tribal,
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

Enclosures:

1. Form NRC 313
2. Form NRC 314