



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL HEALTH AND ENVIRONMENTAL EFFECTS
RESEARCH LABORATORY
ATLANTIC ECOLOGY DIVISION
27 TARZWELL DRIVE • NARRAGANSETT, RI 02882

OFFICE OF
RESEARCH AND DEVELOPMENT

February 12, 2018

Licensing Assistance Team
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

Re: Renewal of License # 38-11957-01

Br. 3
03006356

REC RG1021318AM1008

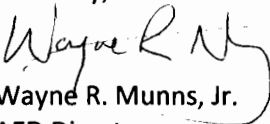
In response to the NRC notice dated January 2, 2018, we request extension of our NRC material license #38-11957-01, expiration date March 13st, 2018. Please see Attachment A for specific responses to NRC Form 313, items 5 through 11.

Delays have been experienced resulting in the need for the license extension. AED has conducted a partial MARRSIM survey of approximately 50 % of the areas of concern, in accordance with NUREG 1757. AED has completed a Historical Radiological Survey and is developing closure plans in accordance with NUREG 1757. We hope to have a package in to NRC to review by end of CY 2108.

As we move forward with the decommissioning to achieve "unrestricted use" status we request the following:

1. Extension of our current NRC license.
2. Change of Radiation Safety Officer from Dr. Burgess to CDR Begluitti.
3. Removal of item E. Nickel 63 from the license 38-11957-01. This is an Electron Capture Detector which will be managed through the manufactures General License, as the state of Rhode Island is an agreement state. (supporting documentation enclosed).

Sincerely,


Wayne R. Munns, Jr.
AED Director

602461
NMSS/RGN1 MATERIALS-002

Enclosures: NRC Form 313
Attachment A, addressing items #5 to 11 on NRC Form 313
Attachment B, Letter to Rhode Island, Department of Health, Radiation Control Program

Attachment A

Re: License Renewal 38-11957-01

Item #5: Radioactive Material.

Byproduct, source and/or special nuclear material	Chemical and/or physical form	Maximum amount that licensee may possess at any one time under this license
A. Any byproduct material with atomic numbers 1 through 83	Any	1 millicurie per radionuclide and 1 millicurie total
B. Hydrogen 3	Any	50 millicuries
C. Carbon 14	Any	50 millicuries
D. Sulfur 35	Any	50 millicuries
E. Nickel 63	Sealed Sources (QSA Model No. NBCD or Isotope Products Laboratory Model No. NER-004A	18 millicuries per source and 180 millicuries total

Item #6: Purpose for Which Licensed Material Will Be Used.

- 1) A., B., C., and D. (from **Item #5**, above) will be used in laboratory studies.
- 2) *We request that this item be removed from License 38-11957-01.* E. (from **Item #5**, above) will be used in gas chromatographs for sample analysis. Please note that we do not currently possess any Ni-63 sealed sources listed on our current license of limited scope. As such, all of the Ni-63 sealed sources currently located at our facility are issued under a general license pursuant to the regulations contained in 10 CFR Part 31.5. AED has notified the State of Rhode Island's registration program in accordance with the general license.

Item #7: Individuals Responsible for Radiation Safety Program and Their Training and Experience.

CDR Begluitti meets the requirements to function as the AED RSO through a combination of training, certifications, education and experiences:

- CDR Begluitti has been trained by Dr. Burgess for the past three years to take over the day to day activities of ROS, in addition to managing the overall radiation program at AED.
- He is a Certified Industrial Hygienist. This certification and its maintenance have requirements for radiation safety.
- He is a Certified Hazardous Materials Manager. This certification and its maintenance have requirements for radiation safety.
- He received his Master of Public Health degree in Toxicology/Risk Assessment which included a focus on health effects associated with radiation exposure, natural occurring and manmade.
- He received his Bachelor of Science degree in Environmental Health which included a focus on Radiological Safety and Industrial Hygiene.

- CDR Beglitti attended and completed the Uniformed Services Health Sciences University WMD Emergency Management - *Nuclear, Radioactive and High Yield Explosives* course in Bethesda, MD in 2007.
- As a consultant in Florida he was the project manager for the Hillsborough County School System Radon Management Program.

All incumbent authorized users are still in place.

Item #8: Training for Individuals Working In or Frequenting Restricted Areas.

We are not requesting new authorized users to be added to the license.

Item #9: Facilities and Equipment.

Storage of radioactive materials:

All licensed materials (excluding sealed sources) are stored within locked room number 3 within our Hazardous Materials Building. The room is dedicated to radioactive material storage and is under 24 hour a day video monitoring. With the exception of sealed sources, no material is stored within laboratory space.

Item #10: Radiation Safety Program.

No changes to Radiation Safety Program. In addition, this facility has not had any uses of radioactive materials since November 2010. AED is undergoing a staged decommissioning of the facility leading to license termination in the near future. As such, there has been no future receipt and/or use of open compound radioactive material under this license.

Item #11: Waste Management.

Procedures locally adopted are modeled on the waste procedures published in Appendix T to NUREG-1556, Vol. 7, Program Specific Guidance about Academic, Research and Development, and Other Licenses of Limited Scope, dated December 1999. At this time all known contaminated waste has been removed from the facility.

NRC FORM 313 (10-2017) 10 CFR 30, 32, 33, 34, 35, 36, 37, 39, and 40		U.S. NUCLEAR REGULATORY COMMISSION APPLICATION FOR MATERIALS LICENSE	APPROVED BY OMB: NO. 3150-0120 Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov , and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.				
EXPIRES: 06/30/2019							
INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.							
APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH: MATERIALS SAFETY LICENSING BRANCH DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555-0001 ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS: IF YOU ARE LOCATED IN: ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO: LICENSING ASSISTANCE TEAM DIVISION OF NUCLEAR MATERIALS SAFETY U.S. NUCLEAR REGULATORY COMMISSION, REGION I 2100 RENAISSANCE BOULEVARD, SUITE 100 KING OF PRUSSIA, PA 19406-2713		IF YOU ARE LOCATED IN: ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO: MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION III 2443 WARRENVILLE ROAD, SUITE 210 Lisle, IL 60532-4352 IF YOU ARE LOCATED IN: ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO: NUCLEAR MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION IV 1600 E. LAMAR BOULEVARD ARLINGTON, TX 76011-4511					
PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.							
1. THIS IS AN APPLICATION FOR (Check appropriate item) <input type="checkbox"/> A. NEW LICENSE <input checked="" type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER <u>38-11957-01</u> <input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____		2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code) Wayne Munns, Director U.S. Environmental Protection Agency - AED 27 Tarzwell Drive Narragansett, RI 02882					
3. ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED 27 Tarzwell Drive Narragansett, RI 02882		4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION Gino K. Begliuitti <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">BUSINESS TELEPHONE NUMBER 401-782-3009</td> <td style="width: 50%;">BUSINESS CELLULAR TELEPHONE NUMBER 401-649-0307</td> </tr> <tr> <td colspan="2">BUSINESS E-MAIL ADDRESS begliuitti.gino@epa.gov</td> </tr> </table>		BUSINESS TELEPHONE NUMBER 401-782-3009	BUSINESS CELLULAR TELEPHONE NUMBER 401-649-0307	BUSINESS E-MAIL ADDRESS begliuitti.gino@epa.gov	
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BUSINESS E-MAIL ADDRESS begliuitti.gino@epa.gov							
SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.							
5. RADIOACTIVE MATERIAL a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.		6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.					
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.		7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.					
10. RADIATION SAFETY PROGRAM.		9. FACILITIES AND EQUIPMENT.					
12. LICENSE FEES (Fees required only for new applications, with few exceptions*) (See 10 CFR 170 and Section 170.31) *Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.		11. WASTE MANAGEMENT.					
PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html.							
13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT. THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF. WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.							
CERTIFYING OFFICER – TYPED/PRINTED NAME AND TITLE		SIGNATURE	DATE				



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Ms. Charma Waring
RI Department of Health
Radiation Control Program
3 Capitol Hill Rd. Rm 305
Providence, RI 02908-5907

OFFICE OF
RESEARCH AND DEVELOPMENT

May 11th, 2015

Subject: Management of ECDs under General License

Dear Ms. Waring,

The Environmental Protection Agency, Atlantic Ecology Division (AED) will be terminating its existing NRC license by the end of this calendar year. NRC has notified AED that to maintain the use of a set of Electron Capture Devices we use with our instrumentation we must move the ECDs to a general license.

Please find below a link to the Agilent General License for these devices. The AED will continue to maintain the ECDs in accordance with this general license. Page 70 of these general license indicates that Rhode Island is an agreement state with this Agilent General License.

Please provide a letter of response, indicating any required registration/licensing fees, reporting requirements, and application paperwork.

Please contact me should you have any further questions or concerns. I can be reached at (401) 782-3009.

<http://www.chem.agilent.com/Library/usermanuals/Public/5961-5664E.PDF>

Best Regards,

A handwritten signature in black ink, appearing to read "Gino Begluitti", is positioned above the typed name.

Gino Begluitti, MPH, CIH, CHMM
Safety, Health and Environmental Manager