



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

JAN 24 2019

William Peters, Ph.D.
Radiation Safety Officer
Niowave, Inc.
1012 N. Walnut Street
Lansing, MI 48906

Dear Dr. Peters:

Enclosed is Amendment No. 07 to your NRC Materials License No. 21-35144-02 in accordance with your request.

You requested authorization for the following individuals to use all radioactive materials listed in your license: Alex Bakken, Ph.D., Amanda Grimm, Nathan Johnson, Christine Krizmanich, Mayir Mamtimin, Ph.D., Faisal Odeh, William Peters, Ph.D., Kristin Shannon, Ph.D., and Robert Wahlen. Based on the information which you provided regarding the formal training and/or education in radiation safety (topics covered; duration of training; when training was received; and identity and location of training provider) and experience using licensed materials (isotopes; physical/chemical forms; quantities handled; activities performed; and duration of experience), we have authorized the following individuals as authorized users for the licensed material that they have had experience with: Alex Bakken, Ph.D., Amanda Grimm, Nathan Johnson, Christine Krizmanich, William Peters, Ph.D., and Kristin Shannon, Ph.D. We did not add Mayir Mamtimin, Ph.D., Faisal Odeh, and Robert Wahlen to the license because the training and experience information provided for these individuals were insufficient and did not meet the criteria listed in NUREG-1556, Volume 7, Revision 2, Section 8.7.2, "Authorized User". If you would like to authorize Mayir Mamtimin, Ph.D., Faisal Odeh, and Robert Wahlen for all licensed material, please provide information demonstrating that each proposed AU is qualified by training and experience to use the requested licensed materials. Information should include, as a minimum: 1) formal training or education in radiation safety (topics covered; duration of training; when training was received; and identity and location of training provider (note: a course outline may be provided)); and 2) experience using licensed materials (isotopes; physical/chemical forms; quantities handled; activities performed; and duration of experience). Proposed AUs must demonstrate training and experience with the type and quantity of material they propose to use.

In addition, we did not add 120 millicuries of radium-226 in any physical/chemical form to your license. Based on the information you provided, we determined that the proposed users lack: 1) experience in working with unsealed radioactive isotopes in categories with high radiation hazards and large quantities, 2) experience in dealing with emergencies involving radioactive material, and 3) work experience in managing a high risk radiation safety program involving the use of high hazard radionuclides.


Please note that based on the newly added licensed material, License Condition No. 14.C. regarding the sealed source leak test requirements was added.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers. You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,


Frank P. D. Tran
Health Physicist
Materials Licensing Branch

License No. 21-35144-02
Docket No. 030-38770

Enclosure: Amendment No. 07