

From: [Hart, Timothy P Sr CTR DTRA J0 \(US\)](#)
To: [Naquin, Ty](#)
Cc: [Zimmerman, Jacob](#); [Davis, Sherry J CIV DTRA OFFICE OF THE DIR \(US\)](#); [Harriel, Henry E \(Hank\) CIV DTRA OFFICE OF THE DIR \(USA\)](#); [Mannis, Daniel N LCDR USN DTRA R AND D \(USA\)](#); [Stroh, Brian J CIV DTRA OFFICE OF THE DIR \(US\)](#); [Hinton, Michael W CIV DTRA J0 \(US\)](#); [Rush, Stephanie J CTR DTRA J0 \(USA\)](#)
Subject: [External_Sender] RE: Hours Eval
Date: Thursday, April 18, 2019 8:51:30 AM

Ty,

Thank-you for the information, I will pass this on to our team. I am sure we will have additional questions and need for clarification as we go forward. I really do appreciate your help and guidance and look forward to working with you on this project.

R

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"Responsibility is a unique concept... You may share it with others, but your portion is not diminished. You may delegate it, but it is still with you... If responsibility is rightfully yours, no evasion, or ignorance or passing the blame can shift the burden to someone else. Unless you can point your finger at the man who is responsible when something goes wrong, then you have never had anyone really responsible."

— Hyman G. Rickover

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

From: Naquin, Ty [<mailto:Tyrone.Naquin@nrc.gov>]
Sent: Thursday, April 18, 2019 8:40 AM
To: Hart, Timothy P Sr CTR DTRA J0 (US) <timothy.p.hart1.ctr@mail.mil>
Cc: Zimmerman, Jacob <Jacob.Zimmerman@nrc.gov>
Subject: [Non-DoD Source] Hours Eval

Hi Tim,

This is what I owed you coming out of the meeting 2 weeks ago. I wanted to send this over to you for your team in your planning regarding license application. Let me know if other questions arise and I can assist.

In addition to Hopkins, we have three other licensees (Homeland Security) that requested similar classes of SNM licenses. We have evaluated the hourly charges for review of the application to license issue and the average total hours for review is 550. This includes all Project Management (PM) and specific technical areas of review. I am providing this as an estimate only, but it holds up pretty well.

The charges involved in the process for license issue involves a series of steps:

- An applicant submits an application to Document Control.
- The PM will have already assembled a team of technical reviewers and will distribute the application for an Acceptance Review. This is a very important step. The Acceptance Review is a cursory review of the application to ensure it addresses items critical to license issue. A serious deficiency in the application can make it unacceptable for further review. For example, if an applicant failed to provide a criticality safety review or describe fire protection measures, these are showstoppers. A license could not be issued and the application would be returned.

This is not to say that there can be no deficiencies in an application. An application that fails Acceptance has a deficiency serious and means the applicant hasn't done their homework and provided a thorough application.

- Once an application is accepted, a letter will be issued to the applicant identifying acceptance and a detailed review will begin.

- Technical reviewers will conduct a detailed review of each area to determine if the application adequately addresses the Acceptance Criteria as you find it in the NUREG-1520. There are some criteria in the 1520 that are specific to a fuel facility and would not apply to an application such as yours. That would be clarified ahead of time. If a technical reviewer feels the application needs further detail regarding a particular topic, or detail specific to the location of material use, a Request for Additional Information (RAI) will be prepared. An RAI is a formal written request for further information and it will be answered formally in written fashion. RAIs from each of the technical reviewers will be compiled and sent to the applicant for answer. Prior to sending, the RAIs would be discussed in a meeting or teleconference to ensure the applicant understands what is coming and what is being asked. I'm wanting to give you the picture that these are all time-consuming activities. Thoroughness and quality in an application submittal will result in fewer RAIs and less time taken in this step. Moreover, when there are RAIs, it is incumbent upon the applicant to address them completely so as to not result in another round of RAIs.

- Each technical reviewer will eventually write up a Safety Evaluation and all compiled in one report which then undergoes administrative review followed by review by our Office of General Counsel. Once completed, it would be signed by our Division Director and issued for 10 years.

I can't emphasize enough to be thorough in your application development. Assuming you may have several people helping in developing the application, I would recommend you appoint a PM on your end to oversee the work being done and set up some kind of internal review process; kind of an independent review to ensure you are producing a high quality application. Having the application and support provided by Dave Bisson at Hopkins will be very helpful to you. Another thing to point out in thoroughness of application is to ensure you apply for what you want. The license can be amended after it's issued, but amendments will require review and result in charges in addition to the annual costs.

The other thing I would add to this discussion that may add to charges will be the complexity of your application. This bit of discussion at our meeting of using these materials in various locations out of country will be a new wrinkle to be worked out, but I believe a 500-600 hour estimate for review of what we have discussed should be about right.

Ty

T. D. Naquin, CHP

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