



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

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

MAR 16 2020

Cynthia Myers, CIH  
Radiation Safety Officer  
DDP Specialty Electronic Materials US, Inc.  
3400 S Saginaw Rd.  
Unit 96  
Midland, MI 48640

Dear Ms. Myers:

Enclosed is your Amendment No. 2 to your NRC Material License No. 21-35537-01 in accordance with your December 17, 2019 request, with the exceptions of (1) adding radionuclides defined as "Special Nuclear Material" (SNM) in Title 10 of the *Code of Federal Regulations* Section 70.4 to the license, (2) authorizing 1 millicurie total possession of neptunium and (3) increasing per-radionuclide possession limits from the original request as stated in your February 27, 2020 letter. These documents may be found in our NRC Agencywide Documents Access and Management System (ADAMS) at accession numbers ML19351C962 and ML20058H168, respectively. NRC's ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

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 (NRC), Region III office at (630) 829-9887 so that we may provide appropriate corrections and answers.

Please note, that, based on the authorized use, we have preliminarily determined that the applicable program code associated with the added materials and uses is 03124, as it is associated with certain testing applications occurring at your facility. If NRC determines that a separate program code applies, we will notify you, along with applicable fees required.

Regarding your request for authorizations for uranium, uranium-235, and plutonium, please note that we have limited this amendment to the authorization of byproduct material. If an authorization for special nuclear material is needed, please resubmit that portion of your request, enclosing the applicable fee, associated with Category 1.D., as listed in 10 CFR 171.16. In addition, if the total possession limit needed, for special nuclear material, will exceed 10 microcuries, financial assurance is required, pursuant to 10 CFR 70.25.

Regarding your request for an authorization of 1 millicurie total of neptunium, please note that we have limited to the authorization to 1 microcurie for each of neptunium-237 and neptunium-239. If additional neptunium radionuclides are needed, please clarify the specific radionuclides. If such radionuclides are unknown, please explain the same. In addition, if the total possession limit needed, for neptunium radionuclides, will exceed 10 microcuries, financial assurance is required, pursuant to 10 CFR 30.35.

Regarding your request to increase per-radionuclide possession limits to 1 millicurie, for atomic number 1 through 92 byproduct material, additional justification is needed for the higher limit.

The enclosed document contains sensitive security-related information.  
When separated from this cover letter this letter is uncontrolled.

C. Myers

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Finally, please note that Condition No. 25 has been added to your license, clarifying that your license limits possession to quantities below those requiring financial assurance. If total possession may exceed the quantities specified in 10 CFR 30.35, financial assurance is required.

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.

NRC's Regulatory Issue Summary (RIS) 2005-31 provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through NRC's ADAMS. Pursuant to NRC's RIS 2005-31 and in accordance with 10 CFR 2.390, the enclosed license document is exempt from public disclosure because its disclosure to unauthorized individuals could present a security vulnerability. The RIS may be located on the NRC Web site at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/ri200531.pdf> and the link for frequently asked questions regarding protection of security related sensitive information may be located at: <http://www.nrc.gov/reading-rm/sensitive-info/faq.html>.

A copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS.

Sincerely,



Sara A. Forster, M.S.  
Health Physicist  
Materials Licensing Branch  
Division of Nuclear Materials Safety

License No. 21-35537-01  
Docket No. 030-39163

Enclosure: Amendment No. 2