

From: [Elliott, Robin](#)
To: [Bose, Satya R.](#); [Wutoh, Anthony K.](#)
Cc: [Courtemanche, Steven](#); [Janda, Donna](#); [Cahill, Christopher](#)
Subject: Request for Relief from Regulatory Requirements, Request for Additional Information
Date: Thursday, April 16, 2020 2:13:00 PM

License No.: 08-03075-07

Docket No: 030-01321

Control No: 618599

Licensee Name: Howard University and University Hospital

This refers to your notification dated April 10, 2020, requesting relief from regulatory requirements and license commitments during the Covid-19 pandemic. In order to continue our review of your request, the following additional information is needed:

1. In your request letter, you indicated that Howard University and Howard University Hospital have mandated all non-essential employees to begin remote operations. Please clarify who is determined to be non-essential employees; e.g. radiation safety staff, Nuclear Medicine staff, Radiation Oncology staff, research principle investigators?
2. The Temporary Exemption (TE) if granted, authorizes an exemption from regulations and the commitments made in your license application for a period of 90 days. In general, suspending survey requirements will only be permitted for facilities where licensed material is not being used for the period of the TE. For facilities where licensed activities continue, compensatory measures need to be adopted to authorize exemption from your current requirements.
3. Regarding your specific requests:
 - a. Will shipments of licensed material continue to be received at the hospital loading dock? Will potentially contaminated materials be removed from the campus through the loading dock? If so, what compensatory measures will be in place to address the requirements of 10 CFR 20.1101, 10 CFR 20.1301, 10 CFR 20.1501, 10 CFR 20.1906, and 10 CFR 35.92, etc.
 - b. Will RSO facilities/labs continue to be locations where licensed material is used? If so, what compensatory measures will be in place to address the requirements of 10 CFR 20.1101, 10 CFR 20.1501, 10 CFR 20.1801, etc.
 - c. Will the hospital Nuclear Medicine and Radiation Oncology hot labs continue to be used for licensed activities? If so, what compensatory measures will be in place to address the requirements of 10 CFR 20.1101, and 10 CFR 20.1501, and 10 CFR Part 35, etc.
 - d. Items 4 and 5 of your request for an exemption involve quarterly and semi-annual surveys of Howard University research laboratories. Please confirm whether research activities are on-going during the COVID-19 PHE. If there are no licensed activities in a research laboratory, then the surveys may be suspended for the full period of the TE. If there have been licensed activities leading up to the PHE but all research has been suspended, then surveys may be suspended for the full period of the TE. If licensed activities continue through the PHE, then the licensee must provide compensatory measures to ensure the health and safety of the

public.

- e. Will the Howard University Hospital clinical labs continue to use licensed materials? If so, what compensatory measures will be in place to address the requirements of 10 CFR 20.1101, 10 CFR 20.1301, and 10 CFR 20.1501, license commitments, etc.
- f. Your letter referenced monthly and quarterly dosimeters for occupationally exposed individuals. For clarification, no change was requested for monthly dosimeters; however, you requested that quarterly dosimeters be exchanged on an annual basis. Given that the USNRC will be granting a temporary exemption for a 90 day period only, your request for an annual exchange rate cannot be approved. Describe groups assigned quarterly dosimeters. For instance, are these groups traditionally workers receiving less than 10 % of the occupational exposure limits?

In order to facilitate your request, reply via email as soon as possible and copy Steve Courtemanche. We will be unable to respond to your request until your response is received.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Regards,

Robin L. Elliott

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