



DATE: 04 May 2020

TO: Elizabeth Ullrich, Senior Health Physicist  
Mail Control No. 617658  
U.S. Nuclear Regulatory Commission, Region I  
Division of Nuclear Materials Safety  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406

FROM: Director, Laboratory Safety; Office of Laboratory Science and Safety

SUBJECT: Response to NRC Additional Information Request Letter dated April 9, 2020, regarding  
CDC updated Decommissioning Funding Plan (DFP) dated December 30, 2019 for NRC  
Materials License No. 10-06772-01

This is in response to your letter dated April 9, 2020, requesting additional information in support of the CDC's updated DFP dated December 30, 2019, submitted by Narvaez Stinson (previous RSO). Thank you for your review and for the opportunity to address your inquiries. Please see the following responses to your inquiries:

**Item 1. Inquiry:** When submitting future license documents, please have the document signed by a management representative rather than the Radiation Safety Officer. The NRC views a letter signed by a management representative as indication that management has reviewed the application and concurs in the statements and representations contained therein.

**Response:** Effective immediately, CDC license documents submitted to the NRC will have the appropriate management representative's signature(s) to indicate concurrence with documents and/or statements being provided to the NRC for review and/or approval.

**Item 2. Inquiry:** Section A.3.1.1 OF THE DFP cost estimate states that more than 20 laboratories in 5 buildings were decommissioned in 2018 on the Roybal and Chamblee campuses, and that all facilities at the Lawrenceville location were decommissioned in the past. Because of this, these laboratories were not included in the cost estimate in this DFP. Before we can accept this cost estimate, we need to review the documentation that demonstrates the decommissioning of these laboratories meet the NRC release criteria in Subpart E of 10 CFR Part 20. Please provide the following:

- a. The historical site assessment that identifies the types, quantities and uses of radionuclides that were used in each laboratory;
- b. A description and results of any characterization surveys that performed prior to the final status surveys;
- c. A description of any remediation activities performed prior to the final status survey;



d. The final status survey plan(s), which should include the basis for the release criteria used in the final status survey, the classification of survey areas, the types of surveys to be performed and the instrumentation to be used, and any special survey or radiation safety activities required; and

e. The results of the final status surveys.

**Response:** There were a total of 12 radiation laboratories in five buildings at CDC that were decommissioned in August 2018 by an outside and qualified licensed contractor (Philotechnics, Ltd.). Regarding the Description of Facility Buildings, please refer to the CDC DFP, page 7 of 51, paragraph 2, which states that “In August 2018, the Radiation Safety Activity decommissioned 12 laboratories that were previously designated as radiation laboratories, and released them for unrestricted use”. The decommissioning activities involved eleven laboratories at the Roybal campus Clifton Road location which included: three labs in Building 15, two labs in Building 17, two labs in Building 18 and four labs in Building 23. At the Chamblee campus Buford Highway location, one lab was decommissioned in Building 110.

To address your inquiries in Item 2.a thru 2.e above, enclosed please find a copy of the CDC 12 Labs Final Status Survey Report dated August 6, 2018, prepared by Philotechnics, Ltd. This report contains the specifics, details, and data analysis on the decommissioning activities of the above laboratories that were released for unrestricted use.

Regarding the Lawrenceville facility decommissioning, the Agency just recently (April 2020) approved the funding for the project, and has awarded Philotechnics, Ltd. (contractor) to perform the decommissioning of the radioactive waste burial site and laboratories at the Lawrenceville location. The start of this project is pending due to the COVID-19 Pandemic, and adherence to CDC guidelines on social distancing to ensure health and safety of the public and employees. CDC plans to submit the Letter of Intent to Decommission, and the Decommissioning Plan (DP) to NRC for review and approval prior to initiation of this project.

**Item 3. Inquiry:** Based on the DFP and review of past inspection and licensing documents, we are aware that some of the laboratories used small quantities of special nuclear material and source material in unsealed forms, and perhaps other alpha-emitting radionuclides. The surveys necessary for detecting alpha emitters in quantities that meet the NRC release criteria usually require different instruments and separate surveys from those for beta/gamma emitters. Specifically address the decommissioning for laboratories which used alpha emitters, if that information is not included in our response to Item 2 above.

**Response:** Please refer to the enclosed copy of the CDC 12 Labs Final Status Survey Report dated August 6, 2018, prepared by Philotechnics, Ltd., to address the above inquiry.



Again, we appreciate the opportunity to address your inquiries, and if you have further questions or need any additional information in support of the DFP approval request, please contact Dr Brandt at (404) 639-0281 (office) or [mbb4@cdc.gov](mailto:mbb4@cdc.gov) (email), and/or Cynthia Long, RSO, at (404) 639-3416 (office), (404) 772-8645 (wk cell) or [xgt6@cdc.gov](mailto:xgt6@cdc.gov) (email).

Sincerely,

Mary E. Brandt, Ph.D.  
Director, Office of Laboratory Safety  
Office of Laboratory Science and Safety

Cynthia Long  
Radiation Safety Officer  
Office of Laboratory Safety

Enclosure:

CDC 12 Labs Final Status Survey Report dated August 6, 2018, prepared by Philotechnics, Ltd.