

OCT 04 1984

License No. 18-02774-01
Docket No. 030-04490
Control No. 02310

The Jackson Laboratory
ATTN: Wesley G. Beamer, Ph.D.
Otter Creek Road
Bar Harbor, Maine 04609

Gentlemen:

This is in reference to your application dated April 12, 1984, to renew License Number 18-02774-01. In order to continue our review, we need the following additional information:

1. Type A licenses require that the Radiation Safety Committee (RSC) review proposed uses of licensed material and approve or deny the users who will supervise use of byproduct material. This should be listed as a responsibility of the RSC. In addition, please describe the method the committee will use to exercise its authority including the minimum number of members to constitute a quorum.
2. Item 15 of your application appears to exempt certain packages containing licensed material from safe opening procedures. There are no exemptions from safe opening procedures in 10 CFR 20.205. 10 CFR 20.205 is divided into four parts:
 - a. Paragraph (b) refers to monitoring for surface contamination upon receipt of packages containing licensed material. This paragraph contains the exemptions referred to in your application.
 - b. Paragraph (d) refers to procedures for safely opening packages containing licensed material. There are no exemptions in Paragraph (d).

Appendix F of Regulatory Guide 10.8 contains a method that is acceptable to the NRC staff for implementing the regulation in 10 CFR 20.205(d), which applies to all packages containing licensed material. You cannot use the exemptions in 10 CFR 20.205(b) which apply to receiving packages, as substitute for the procedures in Appendix F which apply to opening packages.

3. Please confirm that a member of your laboratory administration will participate as a member of the RSC.

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4. Please provide the specifications of your incinerator. Include flow rates, stack heights, and stack location with respect to intake structures and other buildings. Please submit information which indicates all appropriate state and local permits have been obtained. Good practice requires that emissions be kept as low as reasonably achievable (ALARA). Please submit your methods for assuring that effluent concentrations will not exceed the limits in 10 CFR 20, Appendix B, Table II, Column I when averaged over 24 hours and will not exceed 10% of these limits when averaged over one year.
5. Incineration for isotopes other than H-3 and C-14 meeting the requirements of 10 CFR 20.306 through your oil burner must be authorized by NRC pursuant to 10 CFR 20.302. Please submit justification of your request.
6. Please confirm that you will leak test the I-125 sealed source at least every 6 months.
7. Your emergency procedures are insufficient. Please refer to the enclosed Appendix H to Regulatory Guide 10.8 and submit revised procedures.
8. Page 10 item 13 of your application mentions stock solutions "insofar as possible" will be stored in the hot lab. Please confirm that stock solutions will always be stored in the hot lab or describe your exceptions and what other protective measures you will take to control byproduct materials.
9. Please provide flow specifications on your laboratory hoods where unsealed byproduct materials are used. Include flow rates, and testing frequencies.
10. Please confirm that your RSC will audit the radiation safety program not less than annually.
11. Your application refers to the use of a liquid scintillation counter for smear surveys of Ni-63 detectors. Please confirm that you will use an appropriate calibration source and quench correction.
12. Information on page 6 of your Regulations for Radioisotope Use and page 11 under Facilities and Equipment are in disagreement. Page 6 states RSO will be informed within 24 hours of bioassay data for personnel handling 100 or more microcuries of I-125. Page 11 states 48 hours for notification. Please clarify.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 02310.

Sincerely,

Original Signed By:
John E. Glenn

John E. Glenn, Ph.D., Chief
Nuclear Materials Section B
Division of Engineering and
Technical Programs

Enclosures:
Regulatory Guides 10.8, Appendix H & F

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