

From: [Ullrich, Betsy](#)
To: [Zhu, Shen CIV USARMY USAMC \(USA\)](#)
Subject: RE: your license amendment - a request for additional information
Date: Monday, June 7, 2021 9:08:00 AM

Dr Zhu,

My apologies, I thought your license condition 13 was the more restrictive version that provided NO financial assurance. I see that you are authorized at the \$1,125 level. However, this would limit you to 1 1-millicurie Am241 source and you could have NO other material under Line Item B.

Betsy

From: Ullrich, Betsy
Sent: Monday, June 07, 2021 9:03 AM
To: Zhu, Shen CIV USARMY USAMC (USA) <shen.zhu.civ@mail.mil>
Subject: your license amendment - a request for additional information

Dr. Zhu,

The amendment requested that we change Item B as follows:

B. Any byproduct material with Atomic Numbers 84 through 96	B. Any	B. 1 millicurie per radionuclide and 2 millicurie total and see Condition 13
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However, in "any" form, quantities of Am241 (At No 95) and Ra-226 (At No. 88), as well as any other alpha emitter that is not listed on Appendix B to Part 30, exceeding 0.01 millicuries will require provision of financial assurance at the \$225,000 level' at 0.1 millicuries, FA at the \$1,125,000 level, and above 1 millicurie requires a decommissioning funding plan. I cannot write this line item as you requested above, because you cannot comply with Condition 13 with that 1 millicurie quantity.

However, the amendment explains that you plan to purchase plated sources, which are considered "sealed sources or played foils and would not require financial assurance until you possessed a quantity greater than 100 curies. I would suggest that you revise your amendment to request a separate line item for the Am241 as plated sources, and provide the manufacture and model information for those sources. Alternately, if you do not need any of Item B in an unsealed form, we could amend the license to list the form as "sealed sources, plated sources, or foils".

I will need a response in writing. Please let me know if you will either

- Provide financial assurance to possess the quantities in "any" form as requested; or
- Will request a separate line item for sealed/plated sources of Am241. If so, state the maximum per source and the total amount [please note that, if you are expecting multiple sets with 1 millicurie sources, the 2 millicurie total may not be sufficient; or
- Will request that Item B be changed from "any" form to "sealed/plated sources"

You should send a pdf of a letter to R1DRSSMail Resource R1DRSSMail.Resource@nrc.gov , listing the Mail Control No. 625516 so it gets to processed correctly. You may also cc me on the email so I can work on it immediately to keep this moving.

Let me know if you have any questions.
Betsy

Betsy Ullrich, Senior Health Physicist
USNRC Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406
610-337-5040 (office)
240-704-4575 (cell)
Elizabeth.ullrich@nrc.gov