



P.O. Box 817 — Kingston, TN 37763 — (865) 220-8501

Leyla Coleman
Bionomics, Inc.
1550 Bear Creek Rd.
Oak Ridge, TN 37830

October 20, 2021

Cherish K. Johnson
Chief Financial Officer
U.S. Nuclear Regulatory Commission

Re: Sealed source removal in Idaho in conjunction with NRC and CRCPD

Dear Ms. Johnson:

I hope this letter finds you well. I am writing to request an exemption under 10 CFR Part 170.11, specifically for the fee of reciprocity to be waived. Bionomics is contracted with the Conference of Radiation Control Program (CRCPD) to perform pickups and disposals of obsolete sources through their Source Collection and Threat Reduction (SCATR) program. Our request for exemption would be in the interest of completing a sealed source removal pick up in Idaho that was made at the behest of the NRC and coordinated by the CRCPD.

Ms. Casey Alldredge and Mr. Russ Meyer have been assisting an elderly couple, Mr. Bruce Thompson and Ms. Evelyn Thompson, in the safe removal and disposal of seven sealed sources they have at their residence. Mr. Thompson used these sources for his radiation safety training business, which he ran out of their home for many years. He has since developed [REDACTED]; his wife is attempting to both care for him and dispose of the sources on his behalf. Because of their special situation, the NRC has been in discussion with CRCPD to pay for the disposal of the sources through CRCPD's SCATR and OSRP programs. We now have confirmation that the invoice for this removal and disposal will be paid with the OSRP budget. The staff of Bionomics has arranged for a radiation technician of another company, Thomas Gray & Associates, to package and remove these sources on his way through Idaho. Therefore, we have filed for reciprocity on Thomas Gray's behalf.

We believe that the pickup of these sources meets the following exemption criteria:

§ 170.11 Exemptions. (a) No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for: (1) A special project that is a request/ report submitted to the NRC— [...] (ii) In response to an NRC request from the Associate Office Director level or above to resolve an identified safety, safeguards, or environmental issue, [...]"

If the reciprocity fee is not waived, the monies will be taken out of OSRP's budget, which could be used for other generators who have need of the program.

If there are any questions, please feel free to contact John McCormick, Vice President and RSO of Bionomics, at 865-617-2583; Casey Alldredge, Health Physicist at Material Licensing and Decommissioning Branch, Region IV, at 817- 200-1546, or Russ Meyer, Technical Assistant at CRCPD, at 512-761-3822.

Sincerely,

A handwritten signature in cursive script that reads "Leyla Coleman".

Leyla Coleman
Marketing & Sales Manager
Bionomics, Inc.

Cc: Casey Alldredge, Health Physicist / Materials Licensing and Decommissioning Branch, Region IV NRC
Russ Meyer, CHP, Technical Assistant, CRCPD