

DuPont Specialty Products USA, LLC
DuPont Experimental Station
200 Powder Mill Road
PO Box 8352
Wilmington, DE 19803
(302) 420-2233



January 21, 2022

Docket No. 030-20681
Mail Control No. 629274

Decommissioning Branch Nuclear Regulatory Commission
USNRC – Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713
Attention: Elizabeth Ullrich

RE: DuPont Specialty Products USA., LLC,
Experimental Station, Wilmington DE
U.S. NRC Radioactive Material License No. 07-13441-02
Request to Convert the Broad Scope Type A License to a License of Limited
Scope

Ms. Betsy Ullrich,

As per your email of January 13, 2022, the DuPont Specialty Products USA., LLC would like to confirm the following:

1. The decommissioning activities at the incinerator (and other locations where unsealed licensed materials were used in the past) are being evaluated against the NRC screening values. Based on past surveys of the facilities, and recent characterizations of the facilities, we believe that the NRC screening values are acceptable to demonstrate clearance release and that actual residual contamination is well below the NRC screening values. The facilities in which unsealed licensed materials were used previously will not be released from the license until the results of decommissioning surveys are submitted.
2. The license can be amended to change from a license of broad scope, to a license of limited scope. However, we understand that a line item for residual contamination will remain on the license until such time as decommissioning of the incinerator is completed, and the results are submitted of final status surveys for all areas where unsealed materials were used at your facility in the past.



3. The following authorization is acceptable for that line item:

- a. Material - Any byproduct material with atomic numbers 1 through 83.
- b. Form – residual contamination.
- c. Amount – 10 millicuries per radionuclide and 100 millicuries total and see Condition 11.

Condition 11 will be: In addition to the possession limits in Item 8, as specified in 10 CFR 30.35(d), the licensee shall further restrict the possession of unsealed byproduct materials to quantities less than or equal to 1 E+4 times the applicable limits in Appendix B of 10 CFR Part 30.

4. We also confirm that Ni63, Kr85, Cd109, Cs137, Am241 and Cm244 have been transferred or disposed of (or were never possessed) and to the best of our knowledge none of those sealed sources have leaked.

We understand that this condition would limit the requirement for financial assurance to a pre-certified amount of \$225,000 and for some radionuclides, less than 10 millicuries could be possessed. We will maintain an inventory of estimated radionuclides and amounts at the site.

I appreciate your assistance with this request. Please contact the Radiation Safety Officer, John M. Brisbin (John.M.Brisbin@dupont.com) or call John at (302)-420-2233 if you have any questions concerning this request.

Sincerely,

A handwritten signature in blue ink that reads "Myoshi C. Aubain".

Myoshi Aubain
DuPont Site Manager
Experimental Station - E322/300A
P.O. Box 8352
Wilmington DE 19803

For the US NRC Radioactive Material License Number 07-13441-02
c/o DuPont Specialty Products USA, LLC
Experimental Station
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P.O. Box 8352
Wilmington, DE 19803