

From: [Tran, Frank](#)
To: [Scott Surovi](#)
Subject: RE: RE: [EXT]: Request additional information for NRC Materials License No. 24-04206-01
Date: Wednesday, July 13, 2022 9:32:00 AM
Attachments: [image001.png](#)

Mr. Surovi,

It was supposed to be 24-04206-01, instead of 21-32278-01. The referenced License No. 21-32278-02 in Item 2 should be 24-04206-02. They were errors. I corrected them as seen below.

Thanks for your prompt correction.

Frank Tran

From: Scott Surovi <Scott.Surovi@curiumpharma.com>
Sent: Wednesday, July 13, 2022 8:50 AM
To: Tran, Frank <Frank.Tran@nrc.gov>
Cc: Manuel Diaz <Manuel.Diaz@curiumpharma.com>
Subject: [External_Sender] RE: [EXT]: Request additional information for NRC Materials License No. 24-04206-01

Good Morning Mr. Tran...

I confirm receipt of your electronic communication (dated July 12, 2022; provided below) requesting additional information regarding our pending license amendment application. A response to your questions shall be prepared and submitted to you by July 19, 2022 as requested.

Please note, the material license number (21-32278-01) referenced in the body of your communication is associated with the Curium UC LLC operations based in Noblesville, IN; the materials license number associated with our Maryland Heights operations is 24-04206-01.

Also, it appears that the electronic submission of our license amendment application included an unsigned Affidavit for Withholding From Public Disclosure (Attachment A). I provide an electronic copy of the signed and stamped affidavit to be included with this pending license amendment application.

Please contact me if you require further information at this time.

Scott

Scott J. Surovi, CNMT, RT(R)(N)
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From: Tran, Frank <Frank.Tran@nrc.gov>
Sent: Tuesday, July 12, 2022 4:39 PM
To: Scott Surovi <Scott.Surovi@curiumpharma.com>
Cc: Manuel Diaz <Manuel.Diaz@curiumpharma.com>
Subject: [EXT]: Request additional information for NRC Materials License No. 24-04206-01

Dear Mr. Surovi:

This refers to your letter dated May 3, 2022 requesting an amendment to NRC License No. [24-04206-01](#) for Curium US LLC. We reviewed the letter in accordance with NUREG-1556, Volume 11, Rev. 1 and Volume 12, Rev. 1 and will need the following.

1. You requested the NRC to withhold the letter above from public disclosure and submitted an affidavit in accordance with the NRC requirement in Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390. However, the affidavit were not signed by the company authorized representative and the licensed Notary Public. Please provide a complete affidavit.
2. NRC License No. [24-04206-01](#) is a broad scope license for research and development and manufacturing and distribution. However, you stated that under this license Class 1 access individuals will be the authorized users as described in Section 8.7.2 of NUREG-1556, Volume 21, Rev. 1, "Program-Specific Guidance About Possession Licenses for Production of Radioactive Material Using an Accelerator". You stated that this is to align with your other license ([24-04206-02](#)) which is for the production of radioactive material using accelerators. Based on the scope of License No. [24-04206-01](#) and the applicable licensing guidance, please consider to follow the training program in section 8.7.2 in NUREG-1556, Volume 12, Rev. 1, "Program-Specific Guidance About Possession Licenses for Manufacturing and Distribution". Alternatively, beside your current commitment you could add that you will provide the hands-on training for the proposed authorized users (Class 1 access individuals) as discussed in section 8.7.2 of NUREG-1556, Volume 12, Rev. 1 (this training is more into handling and processing of radioactive material rather than producing radioactive material by irradiation).
3. Please describe qualification for individuals who will provide the initial radiation training as discussed in the letter dated May 3, 2022.

4. Please describe any involvement of the Radiation Safety Committee in the future changes in the radiation safety training program.
5. You proposed several changes to the facilities and equipment in the letter. If there will be changes to the ventilation system or delivery lines, please describe the changes and provide the ventilation diagrams with schematic descriptions of the ventilation systems, with pertinent airflow rates, pressures, filtration equipment, and monitoring systems, if applicable.
6. It appears that the "CAP-88 Models for Public Dose" for Appendix D was not attached. Please provide a copy of that radiation evaluation report.
7. You provided that the facilities will be modified including the removal of old equipment and some building structures which may have been contaminated by activated by irradiation. If contaminated equipment and structure will be removed and disposed, please describe the work activities such as who will perform the work, the authorized NRC or Agreement State license, where the waste will be transferred to, etc.

We appreciate if you could provide the response under a dated and signed cover by July 19, 2022. In the cover letter, please reference Mail Control No. 630873. If you have questions, require additional time to respond, or require clarification on any of the information stated above, please contact me at 630-829-9623 or reply to this email.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this correspondence will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

Best regards,

Frank Tran

Health Physicist/License Reviewer
NRC Region III/Division of Nuclear Materials Safety
Phone: 630-829-9623
Fax: 630-515-1078
Email: Frank.Tran@nrc.gov



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