



State of Connecticut Department of Energy and Environmental Protection

Radioactive Materials Program

RCP-900.2

Rev. 1

Renewal of Licenses

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1.0 PURPOSE

1.1 Applicability

- 1.1.1 The purpose of this procedure is to define the steps required for renewal of a specific license under the Connecticut Department of Energy and Environmental Protection (Department) authority, including those transferred from the Nuclear Regulatory Commission (NRC). This procedure also defines when an expedited renewal form is allowed rather than renewal in entirety. Timely and untimely applications for renewal are also discussed.
- 1.1.2 For the purpose of this procedure, qualification of the license reviewer for a specific license type is verified by the Radiation Control Program Director (RCPD) prior to determining the reviewer.

2.0 SCOPE

- 2.1 This document applies to the Radioactive Materials Program under Connecticut's Agreement State with the Nuclear Regulatory Commission (NRC).

3.0 REFERENCES

- 3.1 The Regulations of Connecticut State Agencies 22a-153-1 through 22a-153-150 and Chapter 446a of the Connecticut General Statutes.
- 3.2 NUREG-1556, "Consolidated Guidance About Materials Licenses".
- 3.3 Title 10 of the Code of Federal Regulations (10 CFR).

4.0 DEFINITIONS & ABBREVIATIONS

- 4.1 Department: The Connecticut Department of Energy and Environmental Protection (CT-DEEP)
- 4.2 Renewal in Entirety: Based on the review of the application, the inspection history, the current license, or a significant change in the applicable rule, the preparation of a total license revision is warranted. An example is a license that has been amended numerous times since the last renewal, such that the scope of the program has changed.
- 4.3 Expedited Renewal: The renewal of a license where the application, the inspection history, and the current license demonstrate that there has not been a significant change in the scope of the licensed program.
- 4.4 License Review: License review is the processing of any licensing action (i.e., new application, amendment, renewal, termination) and serves two capacities – primary review and secondary review.
- 4.5 License Reviewer: Radiation Division personnel qualified to review, process, and document a specific category of licensing action. A license reviewer shall not perform a review for any category of license for which they are not qualified.
- 4.6 Timely Renewal: The receipt of an application for renewal of a license that has been postmarked 30 days or more before the license's expiration date. The license remains in effect until processing of the application for renewal has been completed.

5.0 GENERAL

5.1 EQUIPMENT

5.1.1 None

5.2 PRECAUTIONS AND LIMITATIONS

5.2.1 None

5.3 RESPONSIBILITIES

5.3.1 **Radiation Division Personnel**

5.3.1.1 Notifies a licensee that their license(s) will expire in 90 days and sends appropriate guidance document(s).

5.3.1.2 Informs the Supervising Radiation Control Physicist (SRCP) of licensees that have not submitted renewal applications at least 30 days prior to expiration and of any licenses that have expired.

5.3.1.3 Receives, logs, and acknowledges the receipt of an application for license renewal and informs the applicant that the application is considered to be timely if that is the case.

5.3.1.4 Sends the applicant for license renewal a request for additional information (RAI) and reviews the information submitted by the applicant in response to the RAI.

NOTE

A license reviewer will ensure any correspondence containing security related information to and from the applicant will be marked:

“Official Use Only – Security Related Information – Withold from Public Disclosure pursuant to CGS Sec. 1-210(b)(19)”

5.3.1.5 Maintains the records file with renewal documentation.

5.3.1.6 Completes the license renewal review in the time frame specified in RCP-900.1.

5.3.1.7 Provides information of important findings in the renewal application to the Supervising Radiation Control Physicist (SRCP) or the Radiation Control Program Director (RCPD) in the absence of the SRCP.

5.3.1.8 Performs secondary reviews of license renewal applications as needed, but only of license renewals for which not a primary reviewer. Secondary review is documented using the **Licensing Job Aid** (Attachment 4 in RCP-900.1).

5.3.2 Supervising Radiation Control Physicist

5.3.2.1 Assigns a licensing action for processing to qualified Radiation Division personnel.

5.3.2.2 Reviews the renewal application to see if it is valid and processes the renewal application, as assigned.

5.3.2.3 Recommends whether a renewal application is deficient and should be denied either with or without prejudice. Denial with prejudice requires additional consultation with Department administration and legal counsel.

- 5.3.2.4 Provides information of important findings in the renewal application to the Radiation Control Program Director.
- 5.3.2.5 Performs primary and secondary reviews of license renewal applications as needed.

5.3.3 Radiation Control Program Director (RCPD)

5.3.3.1 Reviews, approves, and signs licenses. This responsibility can be delegated to the Office Director in the RCPD's absence.

5.3.3.2 Performs primary and secondary reviews of license renewal applications for licenses for which qualified as a license reviewer as needed.

5.3.3.3 Following consultation with, and concurrence of, the Department's legal counsel, recommend denial, with or without prejudice, of a renewal application of a license to the Commissioner.

5.3.4 Office Director

5.3.4.1 May perform responsibilities of SRCP.

5.3.4.2 May perform responsibilities of RCPD as delegated.

5.4 PREREQUISITES

None.

5.5 RECORDS

5.5.1 Records to be Maintained:

The following records will be maintained by the Radioactive Materials Program, primarily in an electronic format for each licensee:

5.5.1.1 Specific License.

5.5.1.2 License Application and/or Amendment Request Submittal.

5.5.1.3 Any Deficiency Letters.

5.5.1.4 License Transmittal Letter.

5.5.1.5 Any Requests for Additional Information (RAI).

5.5.1.6 Financial Assurance Documents.

5.5.2 Records Retention

5.5.2.1 Records to Be Maintained

The Application for license renewal plus attachments are maintained in the licensee's file as well as any deficiency letters, requests for additional information, and license transmittal letters generated.

5.5.2.2 Records Retention

5.5.2.2.1 Records are filed electronically using Web-based Licensing (WBL).

5.5.2.2.2 Records may also be kept in other secure electronic forms with access only to Radiation Division personnel.

5.6 ATTACHMENTS

5.6.1 Attachment 1 Sample Renewal Letter for 90-day Notification

5.6.2 Attachment 2 Sample Letter for Receipt of Renewal Application-Timely Filed

6.0 PROCEDURE

The review of an application for renewal of a specific license shall be conducted by Radiation Division personnel qualified to conduct such a review. All applications will have a secondary independent review performed by a qualified license reviewer prior to submission for approval.

6.1 License Expiration

6.1.1 Ninety (90) days prior to a license's expiration date, the licensee shall be notified of the pending expiration date using Attachment 1 and that if an application for renewal is postmarked at least 30 days prior to the expiration date, the application will be timely.

6.1.2 If the renewal application is postmarked less than 30 days prior, but not after the expiration date, the SRCP shall determine if the application should be considered timely.

NOTE:

Pursuant to Section 22a-6j any person who files an untimely application for renewal of a license shall be billed, in addition to the application fee, the following for an untimely submittal:

| Days after last date allowed for filing. | Additional Fee. |
|--|--------------------------|
| Between 14 days and 30 days. | 10 % of Application Fee. |
| Between 31 days and 60 days. | 20% of Application Fee. |
| Between 61 days and 90 days. | 40 % of Application Fee. |
| Between 91 and 120 days. | 50 % of Application Fee. |
| Greater than 120 days. | 65 % of Application Fee. |

6.1.3 If the application is found to be timely, the licensee is informed by letter that activities authorized by the current license may continue until processing of the renewal has been completed. This letter (Attachment 2) must be issued within 30 days of the receipt.

6.1.4 If an application is not received prior to 30 days of expiration of the license, refer to RCP 900.3 *License Termination/Revocation*.

6.1.5 The Radiation Control Program Director or designee, must approve continued operation under the authority of any license for which the renewal application was submitted after the license's expiration date.

6.2 License Renewal

- 6.2.1 Radiation Division personnel must review all license renewals in their entirety. One of the principal reasons for renewing a license in its entirety is to eliminate the confusion that can be caused by multiple amendments to the license and numerous tie-down conditions.
- 6.2.2 License renewal requests are conducted similarly to new license application (RCP-900.1 *Review of Initial Application for License or an Amendment Request*). The time frame for conducting license renewals from RCP-900.1 is 180 days.
- 6.2.3 The license renewal should contain all information that would be included in an initial license of the same program code(s) including tie-down license conditions that are based on any and all referenced license amendments.
- 6.2.4 Expedited renewals are conducted when a request is made by the licensee for new users or uses, such as a new medical modality (e.g., boron neutron capture therapy) or a new radiation safety officer (RSO).
- 6.2.5 Expedited renewals are conducted on an as needed basis and should be completed in a timely manner depending on the scope of the request. They are granted only by the RCPD or the Office Director in the absence of the RCPD.

Attachment 1

Radioactive Materials Program License Renewal Letter



Connecticut
Department of Energy &
Environmental Protection

[DATE]

{LICENSEE NAME}
{CONTACT NAME, TITLE}
{ADDRESS}
{CITY, STATE, ZIP CODE}

SUBJECT: NOTIFICATION TO RENEW CONNECTICUT AGREEMENT STATE LICENSE

Dear {SALUTATION, LAST NAME}:

Your Connecticut Radioactive Materials License No. {LICENSE NO.} expires on {DATE}.

If you wish to renew, please submit a new application with Department Form 313. It must include any and all information or documents previously submitted with the original application and any amendments. Please consult the Department of Energy and Environmental Protection if you wish to reference previously submitted information. Your license will be amended in its entirety utilizing the latest wording on the conditions of your license. These actions should help keep your license as complete and up-to-date as possible. If you do not wish to renew, you must complete Department Form 314 Certificate of Disposition of Radioactive Materials. It is available at our web site: [Radiation \(ct.gov\)](http://Radiation.ct.gov).

Below is a link to the Nuclear Regulatory Commission Regulatory Guide (NUREG-1556) that you should use in preparing the application. All items in the guide must be addressed.

Please complete the application, retain a copy, and submit all renewal requests to the following address:

**Radioactive Materials Program
Radiation Division
Connecticut Dept. of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106**

If your application is submitted at least 30 days before the license expiration date, your license will remain in effect until the application has been finally determined by the Connecticut Department of Energy and Environmental Protection. You will be sent a Timely Renewal letter stating this.

If you have any questions concerning your license or the renewal process, please contact {NAME} at the CT-DEEP at {PHONE NUMBER} or {email address}.

Sincerely,

{NAME}

Radiation Division Director

Enclosure: Copy of License to be Renewed

Link to NUREG 1556 Series of Licensing Guidance:

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>

Attachment 2

Radioactive Materials Program Letter for Receipt of Renewal Application-Timely Filed



Connecticut
Department of Energy &
Environmental Protection

<DATE>

<LICENSEE NAME>

<CONTACT NAME, TITLE>

<ADDRESS>

<CITY, STATE, ZIP>

Attention: <CONTACT NAME>
Radiation Safety Officer

SUBJECT: RENEWAL DEEMED TIMELY

Dear <CONTACT NAME>:

This acknowledges receipt of your application for renewal of Connecticut Radioactive Material License No. <NUMBER>. Your license renewal request has been deemed timely filed and shall not expire until the application has been fully determined by this office.

If you have any questions concerning your license or the renewal process, please contact the Department at <PHONE> or <EMAIL address>.

Sincerely,

<NAME, SIGNATURE AND DATE>

Radiation Division Personnel

<NAME, SIGNATURE AND DATE >

Radiation Division Director