



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

February 2, 2000

Paul Plummer, Procurement
Program Manager
Advanced Input Devices
600 W. Wilbur Avenue
Coeur d'Alene, Idaho 83815

SUBJECT: NOTIFICATION REGARDING THE LOSS OF A GENERALLY LICENSED DEVICE

Dear Mr. Plummer:

This refers to your letter dated January 11, 2000, which was submitted to the NRC pursuant to the requirements of 10 CFR 20.2201(b) to report the loss of a generally licensed device containing byproduct material. Your letter indicated that a Nuclecel In-Line Ionizer containing 370 megabequerels (10 millicuries) of polonium-210 was lost during a company move to a new facility. Based on the construction and packaging of the device, you noted that it was unlikely that any individual would have received a radiation exposure.

Although the improper disposal of a generally licensed device constitutes a violation of 10 CFR 31.5, the NRC is not taking enforcement action for the violation in accordance with the Interim Enforcement Policy for Generally Licensed Devices. The Interim Enforcement Policy for Generally Licensed Devices states, in part, that enforcement action normally will not be taken for violations of 10 CFR 31.5 if they are identified by the general licensee and reported to the NRC, if reporting is required, provided that the general licensee takes appropriate corrective action to address the specific violations and prevent recurrence of similar problems.

We have reviewed your corrective actions and have concluded that information regarding actions taken to correct and prevent the recurrence of similar problems is adequately addressed in your letter dated January 11, 2000. Therefore, no enforcement action is presently being taken. However, you are encouraged to monitor the effectiveness of your corrective actions to ensure continued compliance with 10 CFR 31.5. Future similar problems may be considered for enforcement action.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and your response (if any) will be placed in the NRC Public Document Room (PDR).

Should you have any questions concerning this letter, please contact Ms. Linda Howell at (817) 860-8213 or Mr. Jeffrey Cruz at (817) 860-8164.

Sincerely,

A handwritten signature in cursive script that reads "Linda Howell" followed by a small flourish.

Dwight D. Chamberlain, Director
Division of Nuclear Materials Safety

Docket No. 999-90004
License No. General License

cc w/copy of licensee letter dated 01/11/00:
Idaho Radiation Control Program Director



ADVANCED INPUT DEVICES

Putting Control in Your Hands

Jeffrey Cruz

USNRC

Attention: Division of Nuclear Materials Safety
611 Ryan Plaza Drive
Suite 400
Arlington, TX 76011-8064

January 10, 2000

Dear Mr. Cruz:

Per your request, the following information is being provided in connection with the loss of a Nuclecel In-Line Ionizer from NRD, LLC.

Item #1: Description of Material Lost

The lost item is NRD model # P-2021-8000, serial # 066439. The specification sheets for this device are attached, and all dimensions are listed. Additional physical characteristics include the chemical as being Polonium. The activity is #10 (mCi).

Item#2: Description of Circumstances Under Which Item Was Lost

The item was ordered as a potential solution for a manufacturing problem. After it was ordered, it was determined that it would not work, even before it was received. When our company consolidated from four buildings into one in March 1999, the device was placed in a box with papers and other office supplies. That box was lost during the move.

Item #3: Statement of Disposition

An exhaustive search was conducted to locate the box with the device. Our belief is that it was disposed of in the local landfill, while still inside the box.

Item #4: Exposure

It is very unlikely that any individuals were directly or indirectly exposed to controlled material as material was contained in a larger box.

Item #5: Actions Taken to Recover Material

A company wide search was conducted in an attempt to locate the box. All debris and other materials the moving company could not identify were placed in the local land fill.

Item#6: Actions Taken To Prevent Recurrence

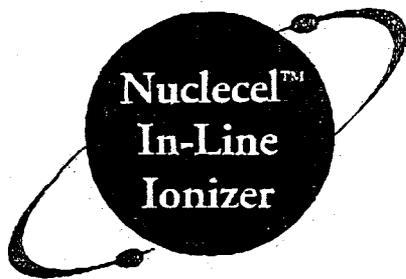
The loss occurred during a one-time move. The company has no further plans to move. Additionally, once it was determined that the device would not be used, it should have been returned. AID has only one other device installed directly on a piece of manufacturing equipment. This device is leased for one year. Just prior to the expiration date being reached, AID leases another device. The maintenance department is notified to remove the expired device and install the new unit. The expired unit is then shipped back to NRD. The fact that none of these items are stocked or warehoused by AID is further insurance against a lost device.

Sincerely,

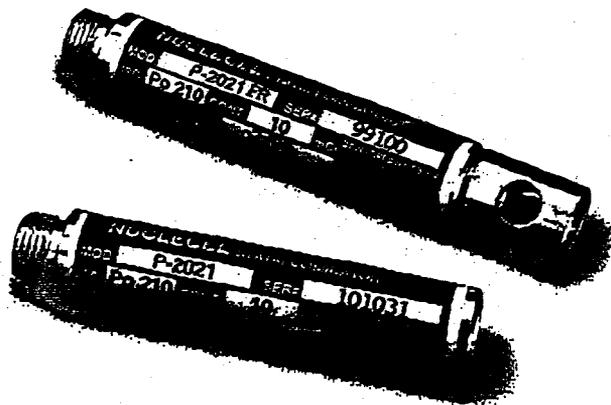
A handwritten signature in black ink, appearing to read 'Paul Plummer', is written over a horizontal line.

Paul Plummer
Procurement Program Manager

600 W. Wilbur Avenue • Coeur d'Alene, ID 83815 (208) 769-4300 FAX (208) 772-2499
E-mail: pplummer@advanced-input.com Website: www.advanced-input.com



- Quickly neutralizes static and removes surface particles
- Ions constantly balanced at nozzle
- Safe and easy to install and relocate



Model P-2021 SS

Simple, reliable, efficient and effective, Nuclecel™ In-Line Ionizer Model P-2021 SS controls static while cleaning in compressed air or nitrogen line applications. It helps improve production yields and quality in a number of industries, including electronics, optics, graphics, and finishing.

Easy to install on any clean, dry compressed air or inert gas line, the Nuclecel ionizer emits a powerful stream of ions to quickly neutralize electrostatic charges. The ion stream is balanced as it leaves the cell, and does not require a specific distance to achieve proper ion intermix. The device may be operated continuously or intermittently with a remote air line control. It is safe to use in explosive or volatile environments, and gas flow can take place in either direction.

Quick, efficient, and maintenance-free

Gases are ionized as they pass through the Nuclecel unit to remove static charges that attract and hold dust and other contaminants. The air stream also removes particles clinging to surfaces and eliminates electrostatic reattraction of contaminants.

By design, Nuclecel ionizers never develop an ion imbalance, and do not require any adjustments or maintenance beyond annual replacement of the ion cell.

Model P-2021 FR

Designed for more demanding environments such as critical clean applications, this stainless steel unit can be supplied ultrasonically cleaned, electropolished, and packaged in a Class 100 hood prior to shipping.



Advanced Static Control Solutions

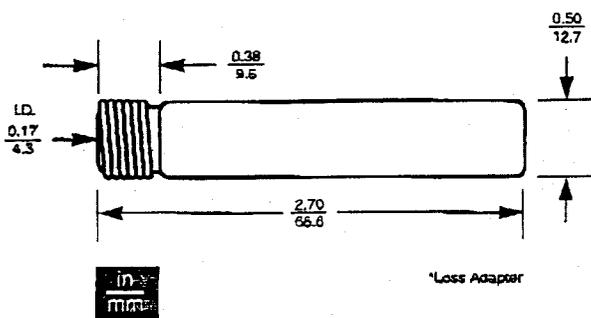
2937 Alt Blvd • PO Box 310 • Grand Island, NY 14072-0310
Phone: 800/525-8076 • 716/773-7634 • Fax: 716/773-7744
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Nuclecel™ In-Line Ionizer

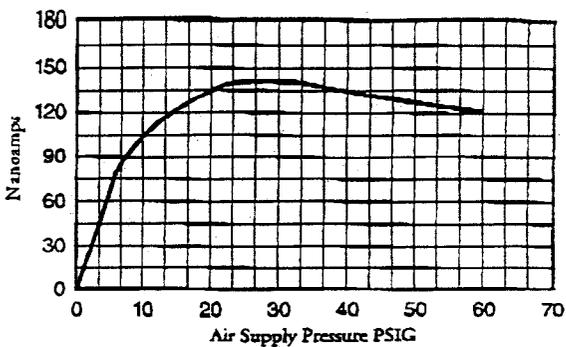
Model P-2021 SS

Nucleel In-Line Ionizer

Dimensions*



Ion Flux



*Ion Flux Monitor 5" dia. electrodes spaced at 1" with 2 KV applied. Device to IFM 6". Pos. & neg. polarities balanced within $\pm 0.1\%$.

Specifications

Width:	1/2" (12.7mm)
Weight:	1.5 oz. (43g)
Material:	Stainless steel, 316
Gas:	Clean, dry compressed air or inert gas
Pressure:	Normal: <40 psig Maximum: 100 psig
Isotope:	Polonium-210
Emission:	Alpha
Activity:	10mCi (370 MBq)
Line Connections:	0.390" - 27 thread

Air Flow Rates

PSIG	SCFM
10	7.6
20	11.0
30	14.4
40	17.8
50	21.2
60	24.6
70	28.0

Decay Rate

1,000 to 100 volts; 0.7 sec. test method; ESD Association Standard 3.1 @ 30 psig, distance one foot.

Note on Ion Source

All NRD ion sources are encapsulated in precious metals by means of a special patented process. This results in a static eliminator which, unlike competitive products, resists oxidation, solvents, heat, cold and vibration.

Note on Ordering

To maintain peak performance and conform to government regulations, ionizers are available on a one-year lease. Notification of lease expiration and an offer to renew will be given prior to the end of each year's lease. Upon arrival of a replacement, the expired ionizer is returned to NRD, LLC.



Advanced Static Control Solutions

2937 Alc Blvd • PO Box 310 • Grand Island, NY 14072-0310
Phone: 800/525-8076 • 716/773-7634 • Fax: 716/773-7744
email: nrd@ix.netcom.com

Notice

NRD warrants that these materials are reasonably fit for the purpose described. We believe that specifications and technical information presented are based on test methods that produce accurate results. The foregoing limited warranty is expressly made in lieu of, and no other express and no implied warranty of merchantability or fitness for a particular purpose is made. NRD, LLC, will not be liable for incidental, consequential, special, exemplary or punitive damages. The limited warranty will not apply to defects or damage due to accidents, neglect, misuse, alterations, error or failure to properly maintain, clean or repair products.

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