

Technical assessments from letter dated 3/10/97, D. Cool to A. Blough
NR-112-D-105-S LB 6600 Gauges

1. X2 source used. NR-112-D-105-S authorized sources in accordance with Drawing No. P-2611-100 only.
 - a. According to Apgee, sources shown in Drawing No. P-2611-100 were not used. All units were sold with Model X2 sources.
 - b. The design of the Model X2 source capsule is essentially identical to that shown in Drawing No. P-26611-100 (see page 39)
 - c. Units with the Model X2 source are not to be considered in the violation of the regulations.
 - d. Drawing for the Model X2 source is unavailable.
2. May distribute sources having ≥ 100 mCi
 - a. No sources with ≥ 100 mCi were distributed (see page 40).
3. Larger hole for mounting
 - a. Apgee provided Attachment 22.
 - b. Not a health and safety concern.
4. New stainless steel labeling material
 - a. Stainless steel label was used, instead of mylar as specified in NR-112-D-105-S
 - b. The material for nameplates, whether stainless steel or mylar, cannot be determined definitively from the information available.
5. Original references for this device are missing from Docket in NR-112-D-105-S background files and Apgee did not provide duplicates upon request.
6. Drawing No. 3A11001 for the Model X2 source is missing and Apgee did not provide duplicates upon request.
7. National Sealed Sources and Devices Registry (NSS&DR) stated that NR-112-D-105-S was amended and corrected on 10/23/92 and 11/02/95, respectively. However, the certificate was corrected on 10/23/92 with other Apgee's certificates. I was not able to trace how the date 11/02/95 was entered into the NSS&DR. It seems to me NSS&DR error.

Comments Regarding the "REVIEWER NOTES" in the Registration Certificate

The actual source used in this device was the Model X2 (Drawing No. 3A11011), not the one approved for the original registration on the basis of Drawing No. P-2611-100. The design of X2 source capsule is essentially identical to P-2611-100, so its use should not be considered to be a violation of the regulations. However, the drawing of X2 is missing.

The hole size for the source holder was increased from 26.2 mm (Drawing No. 19201.200-005) to 26.6 mm (Drawing No. 19201.400-002) to make room for the thickness of the paint and radiation warning sign on the source holder (Drawing No. 19201.200-006), which is slid into the hole. It would not cause a health and safety concern.

New stainless steel labeling material could have been used on some units instead of mylar as previously specified. However, the material for nameplate can not be determined definitely because the Drawing No. 19191.300-004 dated November 23, 1993, did not specify the construction material.

Original references for this device are missing from the Docket and Apgee did not provide duplicates upon request.

REVIEWER NOTE FOR NR-0112-D-810-S

FROM: Seung J. Lee */RA/*

December 15, 2000

The checklist was not used because the information needed to make NR-0112-D-105-S inactive is very limited. The Apgee was unresponsive to the NRC request to provide the information. Therefore, only the currently available information was used.

No incidents involving X2 sources during last 20 years were found through the NMED search.

Enclosed is the summary of items that customarily would have been addressed before making NR-0112-D-105-S inactive. There are 6 items identified. None of them would cause a health and safety concern.

Enclosure: As stated

cc: Fritz Sturz