

February 23, 2001

Mr. Robert M. Hallisey, Director
Radiation Control Program
Department of Public Health
174 Portland Street, 5th Floor
Boston, MA 02114

Dear Mr. Hallisey:

This is in response to your January 31, 2001 letter, concerning Registration Certificate MA-0628-D-137-S, which contains certain AEA Technologies, QSA Inc., radiography devices. We appreciate your and your staff's efforts taken to address this issue. We also recognize that the draft certificate you provided is not the proposed revision, but was for the purpose of clearly demonstrating your points.

Your letter resolves our comments. However, we have one final comment: On page 9, Safety Analysis Summary, we suggest the phrase: "Restrictions on" be changed to: "Special authorizations or exemptions for." The reason for this change is that we do not believe a licensee can use the device outside the overpack without a special authorization or exemption, because the device does not comply with the requirements of 10 CFR 34.20.

In addition, we note that the drop tests outside the overpack were conducted with a "cover plate" in place over the connector mechanism. The cover plate must be removed prior to use. We suggest that, at the next opportunity, you should explore with AEA Technologies whether they should consider an alternative design which does not rely on this cover plate.

We appreciate your assistance. If you have any questions regarding this matter, please contact me at 301-415-3340 or Lloyd Bolling at 301-415-2327.

Sincerely,

/RA/

Paul H. Lohaus, Director
Office of State and Tribal Programs

Robert M. Hallisey

February 23, 2001

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