

ITI Qualitek

267 Boston Road
N. Billerica, MA 01862
(978) 670-1113
(978) 670-1114

Fax

To: Tony *KIRKWOOD* **From:** Dave Morris

Fax: 301 415 5369 **Date:** 5/9/01

Phone: **Pages:** 8 including cover

Re: **CC:**

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

Tony,

Per your request, attached please find the information that was sent out last Monday. If you have any questions, or I can be of any further assistance, please do not hesitate to contact me.

Thank you.

ITi QUALITEK, Inc.

May 1, 2001

Mr. Anthony S. Kirkwood, MSIB-A
Materials Safety and Inspection Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Material Safety and Safeguards
United States Regulatory Commission
Washington, DC 230555-0001

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Email sales@iti-qualitek.com

Dear Mr. Kirkwood:

Please find enclosed two of the requested items that we recently discussed:

1. Drawing No A/200001-1
2. The letter from Bill McGann retyped on ITI Qualitek letterhead and signed by mc.

I am doing my best to obtain the materials requested from Ion Track Instruments any help you can give would be much appreciated.

If you have any further questions, please do not hesitate to call.

Sincerely yours,



David Morris
President

DM/lam



April 30, 2001

Raeann M. Shane, Health Physicist
Material Safety and Inspection Branch
Division of Industrial and Medical Nuclear Safety
Office of Material Safety and Safeguards
Mail Stop T8F5
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Dear Raeann:

I am writing to you to confirm that Ion Track Instruments is now intending to separate from the Qualitek division and wishes to transfer its license, rather than terminate it. According to the exempt license (#20-15525-02E) ITI is authorized to distribute Model 85 and 97 explosives detectors and the Leakmeter 200. I am including a short narrative which should amply describe the request for transfer of the license. Following the narrative, I have provided answers to the 15 items in Attachment IN89-25, Rev 1 dated December 7, 1994.

Narrative

Ion Track Instruments has been only principally involved in distributing Model 85 and 97 from the 205 Lowell Street address in Wilmington, MA while the Qualitek division is involved in distributing the Leakmeter 200 from the Billerica, MA address. In recent years ITI has not actively sold any Model 85 or Model 97 instruments and no longer intends to distribute these products as they are instruments of an "older" product line. Qualitek on the other hand does intend to distribute approximately 25 units of the *Leakmeter 200* products per year.

Ion Track Instruments further holds a license to possess ^{63}Ni material from the State of Massachusetts for its newer products.

Ion Track Instruments is in the process of a re-structuring of its business and in the process, ITI Qualitek will become incorporated in the State of Delaware in its own right. Therefore, after closing, ITI Qualitek will no longer be part of Ion Track Instruments.

Ion Track Instruments (Transferor) will remain operational as a business entity exactly as it is today. The name will not change. The address will not change. The contact

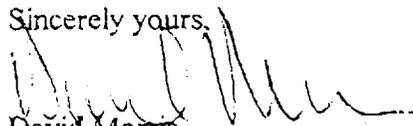


numbers and RSO will not change and there will be no changes in control over licensed activities with the State Of Massachusetts. The facility is not to be decommissioned and all records, surveys and inventories are current and in compliance with the current license.

ITI QUALITEK (Transferee) will also remain operationally the same as a business. It will become incorporated in the State of Delaware. The name will not change. The address will not be change. There will however be a new set of contacts directly at ITI Qualitek for handling licensed activities. Similarly, the Qualitek facility will not be decommissioned and all records, surveys and inventories are in compliance with the Ion Track Instrument's current license.

Please find attached, the specific document relating to the transfer of Ion Track Instruments exempt distribution to ITI Qualitek. Thank you for your consideration in this matter.

Sincerely yours,


David Morris
President

DM/lam

REQUEST TO TRANSFER NRC LICENSE #20-15525-02E

Items of information pertaining to IN89-25 Rev 1 Dated December 7,1994.

1. The new name of the Licensed organization – ITI Qualitek, Inc. 267 Boston Road, Billerica, MA 01862 Telephone: (978) 670-1113.

2. New License contact – Dave Morris (ITI Qualitek - President).

3. ITI Qualitek Management Personnel;

| | |
|-------------------------|-----------------------------------|
| Director – Dave Morris | ITI Qualitek President |
| Officer - Julie Borsody | ITI Qualitek |
| RSO - Mark Jenkins | Operations Manager – ITI Qualitek |

3.1 Authorized Users

Chris Hayden
Dave Morris
Mark Jenkins

AUTHORIZED USERS QUALIFICATIONS

Mark Jenkins (RSO) has over 8 years experience in working the equipment that contains a radioactive source. As a former employee of Ion Track Instruments, Inc. Mark has attended many courses concerning the safe handling, storage, use practices of sources. Additional training will be provided prior to the transfer of the license.

Dave Morris has been a technical products manager for the leak test instruments including those that contain radioactive sources. As a former employee of Ion Track Instrument, Dave has attended courses relative to radioactive Source Handling, use and distribution.

Chris Hayden will be given training on testing and wipe testing equipment containing Radioactive Sources, and will report directly to the RSO. Mark Jenkins will be responsible for the Control, Safety, Storage and Record keeping for all radioactive material including responsibility for corrective actions pertaining to the open inspection items.

4. Ion Track Instruments (the transferor) will remain in a business, which is licensed by the State of Massachusetts for possession and use of by product materials and will also keep its general distribution license.

5. The transaction involves a change in control of Ion Track Instruments and the sale of certain assets to ITI Qualitek which pertain to the leak detection business. This change in control in way affects of the operational aspect of Ion Track Instruments with regard to any licensed activities.
6. The location of the transferee (ITI Qualitek, Inc.) will remain the same as currently listed on the license now held by Ion Track Instruments - the address is 267 Boston Road - N. Billerica, MA 01862. **Mark Jenkins RSO** is employed at the Billerica address.
7. A storage facility will be located at the Billerica address for the storage of exempt distribution products.
8. No changes in the license would have been necessary if the change of ownership had not taken place.
9. As stated above in the narrative, all records, of leak test, surveys, training documentation and inspections are currently in compliance with both NCR and Massachusetts Radiation Control Programs. The procedures used by Ion Track Instruments will be provided to ITI Qualitek to be used as a template for their own activities.
10. Ion Track Instruments produces no nuclear waste of any kind under the current license, nor will ITI Qualitek in the future. The activities of Ion Track and ITI Qualitek are principally involved in distribution of sealed sources of ⁶³Ni with nominal activities of 8 mCi.
11. The facilities of Ion Track Instrument at 205 Lowell Street - Wilmington MA and ITI Qualitek at 267 Boston Road, Billerica, MA will not change as part of the transfer. There are currently no contamination issues at either facility.
12. At the time of Transfer of Ownership any sources, products relating to the leak detection business will transferred to ITI Qualitek, Inc. from Ion Track Instruments, Inc. Instruments included will be the Leakmeter 200. A recent internal audit at Ion Track Instruments shows that there are currently no instruments or materials to be transferred. We foresee no clean up concerns at the transferee facility.
13. 1 ITI Qualitek, Inc. agrees to abide by the commitments and representations previously made to the NRC by Ion Track Instruments, Inc. Including all documents as listed in item 13 - paragraph 1.
- 13.2 ITI Qualitek, Inc. accepts full liability for the site at 267 Boston Rd, N. Billerica, MA. ITI Qualitek will be wholly owned subsidiary of Ai Qualitek in the UK and has more than adequate funds for any decommissioning requirements that in the unlikely event do occur.

- 14 Ion Track Instruments will commit to close out all open issues with the NRC before transfer of the license to ITI Qualitek, Inc. Unless they specifically involve a leak detector product (Lakmeter 200) were ITI Qualitek, Inc. will take the responsibility for this item. Ion Track Instruments has notified ITI Qualitek that it must obtain a materials license from the State of Massachusetts if it wishes to conduct licensed activities other than the distribution of the Leakmeter 200 instrument. (Letter dated December 20, 1999 enclosed for your records).
- 15 ITI Qualitek, Inc. will abide by all the constraints, conditions, requirements, representations and commitments identified in the existing license held by Ion Track Instruments, Inc. ITI Qualitek will provide further details of its program directly to the NRC at their request.

