

71-5939

NEUTRON PRODUCTS inc

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February 1, 2002

Ms. Nancy Osgood, Project Manager
U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

Re: Certificate of Compliance No. 5939 for the Model 1500 package

Dear Ms. Osgood:

This letter is to request that serial number 1506 of the Model 1500 package be reauthorized for wet loading and unloading when used in accordance with General Electric's "Shipping Package Assembly/Disassembly: Generic Model 1500 Type B Shipping Package Loading Procedure" dated November 16, 1992 as modified by Operation Change Numbers 1561 dated November 21, 1997; 1562 dated December 9, 1997, and 1590 dated August 13, 2001 and submitted to you on August 13, 1998.

Neutron Products purchased a Model 1500 package from General Electric in 1986, which was replaced with serial number 1506 in 1989, which is the subject of this request.

Neutron has:

1. used the serial number 1506 model 1500 package for an estimated 100 shipments, mostly involving wet loading and/or unloading;
2. leak tested the serial number 1506 model 1500 package within the 12-month period preceding each shipment and no less frequently than after every third use, in accordance with Section 8.(c) of Revision 28 of the Certificate of Compliance; and,
3. has found and continues to find that the serial number 1506 model 1500 package has maintained its integrity.

General Electric's review of the past and projected usage of the Model 1500 package referenced in Mr. Chris Hamilton's letter to you of August 27, 2001 did not include the past and projected usage by Neutron Products. Further, his statement that "It was concluded that the package has been and will continue to be only used in dry loading operations." may be correct for General Electric's usage of its model 1500 packages, but is not correct for all model 1500 packages.

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The deletion of the wet loading and unloading authorization for General Electric was, based on our review of the General Electric/NRC correspondence, apparently in their interest as a matter of administrative convenience, not as a result of any safety related failure. Moreover, the deletion did not increase protection to users and the public, nor would a reauthorization for wet loading and unloading under the previously approved procedures create any unresolved safety issues.

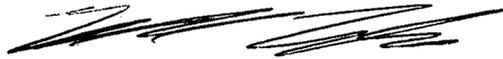
This requested reauthorization for wet loading and unloading operations with the model 1500 is extremely vital to both Neutron Products and its customers, since most, if not all, of them cannot perform dry loading and unloading.

We respectfully request expeditious consideration of this application.

Please contact me promptly, if you require further information

Sincerely

NEUTRON PRODUCTS, INC.



Marvin M. Turkanis
Vice President

NEUTRON PRODUCTS inc