



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

DIVISION OF RADIOLOGICAL HEALTH

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April 12, 2004

Duncan White, CHP
Regional State Agreements Officer
Division of Nuclear Materials Safety
475 Allendale Road
King of Prussia, PA 19406-1415

04 APR 23 P 1:32

RECEIVED
REGION 1

Dear Mr. White:

I am responding to your letter dated March 25, 2004, to Ms. Karen Stachowski. We have reviewed your letter and the attached draft IMPEP report, which documents the preliminary findings of the review team relative to its evaluation of the Tennessee Agreement State program. Attached are our comments regarding the draft report. Thank you for the opportunity to provide these comments.

We appreciate very much the courtesy and professionalism exhibited by you and your team, and by the NRC management representatives who attended the on-site closeout meeting on February 26, 2004. It has been a pleasure working with you.

Sincerely,

Lawrence E. Nanney
Director

cc: Karen Stachowski

LEN:jhg

ATTACHMENT

3.1 Technical Staffing and Training

Page 8, L 1 Please change “non-radiological” to “other”. These inspections include spent nuclear fuel, NORM, NARM, etc.

3.3 Technical Quality of Inspections

Page 11, P. 1, L 10 This sentence is incorrect. Inspection correspondence is issued from the respective field office where the inspection was performed.

4.1.2 Program Elements Required for Compatibility

Page 14, P.2, L 12 Please insert “reviewed by the Attorney General’s office” after the word “Commissioner”.

4.2.1 Technical Staffing and Training

Page 17, P.4, L 5 Please delete “and 2003, respectively.” The two reviewers only attended the 2001 workshop.

Appendix F Sealed Source and Device Casework Reviews

File No.: 2

The source classification was made under the standard current at that time. It was approved in the original registration dated July 24, 1997. The “new” standard was approved in November 1997.

The registrant requested the logo change to “BT” in letter dated November 27, 2000. This change was approved in the previous amendment to the registration dated November 28, 2000.

File No.: 3

c,g) The registration attachments denote dimensions, and the locations of the sealed sources.

The sealed source label would not be applicable for these device drawings.

File No.: 4

- a) The AMC.D3 source remains under an Amersham name registration.

File No.: 5

It is not required that these audit results be submitted to the Division, but that they be maintained for inspection by the State of Tennessee.

File No.: 6 (Issue date June 26, 2001)

- a) This registration only authorizes Berthold Technologies, U.S.A., LLC sources.

We do not require the registrant to submit operations manuals to us.

File No.: 7

These sources were registered by another jurisdiction. We assume that sources approved in other jurisdictions were evaluated with standards that were current at the time of testing.

File No.: 9

Page 2 of the registration states that the device has seven guide tubes, and that each guide tube contains a sealed source attached to a cable. Page 3 indicates that a hole in the upper end of the extension rod accepts a roll pin which secures the cable to the rod. Also, it is stated the cables are composed of braided stainless steel and have a diameter of 1.5 mm.

File No.: 10

- c) A review of the file revealed that the March 17, 2003, letter requested a Model LB 7409-3 device. The registration was issued April 24, 2003.