

From: Jenny Johansen
To: <perry.fan@montesino.com>
Date: Wed, Oct 6, 2004 5:03 PM
Subject: Application for possession and use dated 9/28/2004

Based on our telephone discussion October 6, 2004, it appears you have used the incorrect NUREG 1556 volume in preparing your possession license application. You should have used Volumes 12 and 18 covering Manufacturing and Distribution and Service Provider Licenses.

Please clarify your purpose of use. You indicated in our discussion that the following is what you may have intended.

- (1) Possession, use and storage at your Wilmington facility. Is use limited to demonstration of the device? Is possession and storage of devices in Department of Transportation packaging or do you have a number of unpackaged gauges in storage? I would condition your license to possess a total of 10 gauges at your facility, is this sufficient?
- (2) Installation of gauges at customer's site?
- (3) Performance of initial radiation surveys around the gauge after installation?
- (4) Removal from installation and/or relocation of the gauge at customer's location?
- (5) Disposal of the gauge? (Shipping it back to Italy or shipping to waste broker?)
- (6) Source exchange? (Shipping it back to Italy for Electronic Systems to do?)
- (7) Repair of gauges at customer's site? At your facility in Wilmington?
- (8) Packaging, repackaging and transportation?
- (9) Customer training and instruction in proper use of devices and for conducting routine and in some situations, non-routine maintenance of device?

Please clarify whether you want authorization to remove the source from the device?

Since you may be installing the gauges at the customer's site you need to request use at temporary job sites in NRC jurisdiction.

If your proposed use is any service above, you will need to provide information about the proposed RSO's training and experience as discussed in NUREG 1556 Vol 18 (Volume 18) Page 8-15 to 8-18. Also for the authorized users (the persons who install gauges provide training to customers, etc) you will need to provide information as discussed in Pages 8-18 and 8-19 and Appendix H of Volume 18. Please submit additional information.

I suggest you review the Radiation safety sections of Volume 12 and 18 and then call me to discuss any additional information. My telephone number is 610-337-5071

Jenny Johansen

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From: Jenny Johansen

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