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**U.S. Customs and
Border Protection**

FEB 15 2005

Sattar Lodhi, Ph.D.
Senior Health Physicist
U.S. Nuclear Regulatory Commission
Region 1
Nuclear Materials Branch 2
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Dear Dr. Lodhi:

Reference: License 08-17447-01, Control Number 136451 03030941

This correspondence provides the additional information you requested for the addition of Am-241 wands we want to obtain from the Department of Veterans Affairs to support our training requirements. Our responses are arranged in the categories of questions you asked Richard Whitman on February 14, 2005.

Training: These Am-241 sources are in a wand form. The wand has a handle and a rod, the tip of which contains the source material. The training will include who will be allowed to handle these items, when and how training will be conducted, how to leak test (at 6 month intervals) these items and how to make a monthly report on their status. While these are excess to the Veterans Medical system, their distinct shape makes them ideal to ensure that our personnel only use the handle to move the sources. The length also provides a standoff.

Who will conduct training: Luke McCormick, a Health Physicist, from our Safety Staff will train selected trainers at our Miami location on the proper handling. He will add this material to a permit issued to the lead handler, who has been trained, and will require monthly accountability reports and semi-annual leak tests. The material accountability and leak tests will be reviewed at the U.S. Customs and Border Protection (CBP) quarterly Radiation Safety Committee meetings. Mr. McCormick last received updated 49 CFR training on September 5, 2003.

Storage and Security Considerations: This and our other radioactive materials at Miami are secured in an elevated container in an area of the port exclusive to CBP. No other personnel are in the area unless escorted and our officers are armed. The materials are locked in an elevated shipping container with limited access to the key. No exposure is possible to other CBP employees or the public due to the elevation.

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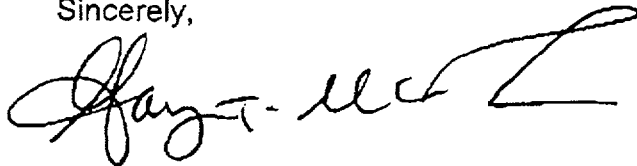
Shipping: Shipment of these sources to Miami is being accomplished in a Type A package with Yellow II markings. If these sources are required for training at an offsite location, and if approved by Luke McCormick or Richard Whitman, the details on shipment will include the container to use, how to package, manifest, mark, survey and label the container. Further instructions will cover which air couriers will be permitted. Movement by government vehicle will be limited and will also be covered in the permit. Both air and ground movement will be in accordance with the 49 CFR 173 requirements.

Accountability: The sources will be bar coded as accountable property within the CBP property management system. The permit, issued by Luke McCormick, will contain instructions to ensure once a month that the wands have the intact source tip in place and we will perform semi-annual leak tests.

Training Focus: These sources are ideal for training needed by CBP Officers in that they can be largely shielded and still have the Americium-241 tips exposed so that trainees can verify the integrity. Our employees will gain confidence in the capability of the Exploranium-135 library to accurately identify these and other isotopes without personal exposure. CBP designs all radiation work with a maximum application of ALARA principles.

Our point of contact is Richard T. Whitman, the U.S. Customs and Border Protection Radiation Safety Officer. He may be reached telephonically at (317) 614-4843 or at richard.t.whitman@dhs.gov on email.

Sincerely,



Gary T. McMahan
Director, Occupational Safety and
Health