

JUN 03 1991

Docket No. 030-32156
Control No. 114425

Veratec
ATTN: Jeffrey W. Loss
Radiation Safety Officer
P. O. Box 20
Rt. 15N and Hafer Road
Lewisburg, Pennsylvania 17837

Dear Mr. Loss:

This is in reference to your application dated March 13, 1991 for a byproduct material license. In order to continue our review, we need the following additional information:

1. Your application should have been signed by a management representative rather than the RSO. Please submit a letter from the management representative indicating that (s)he has reviewed the application and concurs in the statements and representations contained therein. Note also that the management representative should sign all future correspondence, requests for amendment, renewal, etc.
2. 10 CFR 30.32(g) requires that an application for a specific license to use byproduct material in the form of a sealed source or in a device that contains the sealed source must either (1) identify the source or device by manufacturer and model number as registered with the NRC under 10 CFR 32.210 or with an Agreement State; or (2) contain the information identified in 10 CFR 32.210(c). Please provide this information for the sealed sources requested in your application.
3. Please provide the following information regarding the leak-testing of your sealed sources:
 - a. A description of the procedure for wipe-testing the source.
 - b. The instrumentation used to measure activity on the wipe and the lower limit of detectability for this instrumentation.

If you elect to have another person to perform the leak-test, please submit the name of the person, the applicable NRC or Agreement State license number, and the model number of the commercial leak test kit.

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4. NRC would expect facilities performing minor maintenance of gauges to possess a calibrated survey instrument and personnel monitoring devices. Please describe the instruments you will maintain and their calibration frequency. Also provide the type of personnel dosimetry that will be worn by individuals performing these tasks and the exchange frequency of these devices.
5. Please note that the presence or absence of a green indicator light would not be sufficient by itself to assure the gauge shutters are closed prior to performing maintenance on gauges. Please describe another means by which you can assure the source is fully shielded prior to beginning work. This is usually accomplished by the use of a calibrated survey meter.
6. Please describe in detail the training provided to individuals who will perform minor maintenance on gauges. NRC expects individuals to have at least 40 hours of training in the following topics:
 - The principles and fundamentals of radiation protection and good safety practices related to the use of radioactive materials.
 - Radioactivity measurements, use of radiation detection instruments, and monitoring techniques.
 - Biological effects of radiation.
 - Procedures for performing services.
 - Actual practice in performing the services.

You should also provide the following information on the "responsible individual's" training:

- a) An outline of the training program, including the topics covered and the time spent on each topic.
 - b) The qualifications of each instructor in the course.
 - c) How the person or firm giving the training course determined the competency of individuals to perform the services.
7. Paragraph 30.33(a)(2) of 10 CFR Part 30 states that an application will be approved if, among other things, the applicant's proposed equipment and facilities are adequate to protect health and to minimize danger to life or property. Therefore, you should provide information about your equipment and facilities.

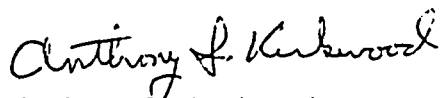
Your application should include the following information and should address each item separately.

- a) The environmental conditions to which gauges will be exposed, e.g., elevated temperature, corrosive atmosphere, vibration.
- b) If the ambient temperature will exceed the maximum operating temperature specified by the manufacturer, thus creating a need to maintain a lower temperature by means of cooling jackets or similar measures, a description of the cooling system should be provided. In addition, provide a discussion of how the cooling system will be maintained and the consequences of a failure of the cooling system.
- c) If a cooling system is used to maintain the temperature below the maximum operating temperature specified by the manufacturer, submit a description of the method and procedures for detecting a cooling system failure and your procedures for coping with a cooling system failure.
- d) Information on the maintenance of gauges, including (but not limited to) frequency, checks that labels are legible and visible, and checks that gauges are protected against corrosive materials or materials at high temperature.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 114425.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely,



Anthony S. Kirkwood
Nuclear Materials Safety Section C
Division of Radiation Safety
and Safeguards

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