

sensor
SERVICES, Inc.

Radiological & Maintenance Services for Industrial Nuclear Gauging Systems
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December 1, 1995

United States Nuclear Regulatory Commission Region I
Attn: Mr Eric H Reber Mail Control No. 122351
475 Allendale Road
King of Prussia, PA 19406-1415

MS 66

L-3

37-3098-026
03036782

SUBJECT: Amendments to Sensor Services, Inc., application to distribute sealed sources, docket # 122351 in response to your deficiency letter dated 11-20-95.

Dear Mr Reber,

In order to comply with your deficiency letter dated 11-20-95, I have included in this letter the following:

- * Revised Supplementary Page Ten to correct typing errors in the original page.
- * Revised Supplementary Page Eleven to comply with requirements for Label supplied by SSI.
- * Metal Tags (Labels) designated A, B, and C.
 - A. Metal tag (3" X 1 1/2") with radiation logo, which will be attached to the dense steel alloy source holder and identifies the Isotope, quantity and the original manufacturer. This tag can only be seen when the source housing side covers have been removed. The included tag is a completed label taken from a recently disposed isotope.
 - B. Metal tag (3" X 2 3/8") titled "Regulatory Conditions" which will be attached to the external area of the source housing unit. This tag does not declare the manufacturer. This label will be installed so it can be seen by plant personnel.
 - C. Metal tag (3" X 2 3/8") with radiation logo, which describes the particulars of the Isotope. This tag does not declare the manufacturer and will be installed next to tag B. A blank is supplied plus a completed tag from a recently disposed Isotope.
- * Pictorial presentation of a fourth tag, designated D, to be supplied by SSI stating this Isotope was installed under SSI's license. This tag (label) will be constructed in the same manner as the other tags leaving room to inscribe the required data for each Isotope. D tag would be installed next to B & C. Due to the fact that the tags must be ordered in bulk, SSI intends to have the exact wording approved before the order is placed. After approval, SSI will supply a blank tag.

NOTE: The labels A, B & C are normally supplied by the original manufacturer. If missing or requiring changes, they will be replaced.

As to comply with your deficiency letter:

- 1-A. 10 CFR 32.51 (A) (3) Instructions and precautions necessary to operation, and servicing of the device. Reference Tag B, third and fourth paragraph which states "OPERATION PROHIBITED IF THERE IS INDICATION OF FAILURE OF, OR DAMAGE TO, CONTAINMENT OF RADIOACTIVE MATERIAL" and "INSTALLATION, DISMANTLING, RELOCATION, REPAIR OR TESTING SHALL BE PERFORMED BY PERSONS SPECIFICALLY LICENSED BY NRC OR AN AGREEMENT STATE".

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OFFICIAL RECORD COPY

ML 10

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INDUSTRIAL MATERIALS-002

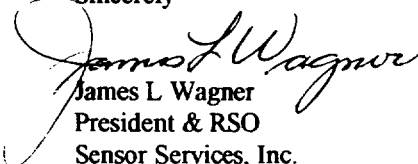
- 1-B 10 CFR 32.51 (A) (3) The requirements, or lack of requirement, for leak testing, or for testing any on-off mechanism and indicators, including the maximum time interval for such testing, and the identification of radioactive material by Isotope, quantity of radioactivity, and date of determination of the quantity. Reference Tag B last paragraph which states "DEVICE SHALL BE TESTED FOR LEAKAGE OF RADIOACTIVE MATERIAL AND PROPER FUNCTIONING OF THE ON-OFF MECHANISM AND INDICATORS, IF ANY, AT INTERVALS SPECIFIED ON THE ATTACHED YELLOW LABEL. Reference Tag C & D for test interval and for particulars on the Isotope.
- 1-C 10 CFR 32.51 (A) (3) The requirement that a tag state "This label shall be maintained on the device in a legible condition. Reference Tag D which states "THIS LABEL, AND ALL LABELS CONCERNING THE RADIOACTIVE ISOTOPE CONTAINED IN THIS DEVICE, SHALL BE MAINTAINED IN A LEGIBLE CONDITION".
- 2.0 Customer's Leak Test procedure, if any. It is SSI's intention not to authorize a Generally Licensed customer to collect leak test samples or independently check the systems on-off mechanisms. If the customer has, or intends to apply for, a Specific License to perform the six month radiological inspection, then SSI will provide the customer with our approved inspection procedure so the customer can submit it, or their own procedure, for approval from the USNRC or the appropriate state agency

Pictorial of proposed SSI supplied label
(Designated D)

"Caution Radioactive Material"				
This unit was redistributed and installed by <i>Sensor Services, Inc.</i> , under USNRC License # _____				
Installation date: _____		Test Interval: _____		
Isotope	Isotope	Serial #	Quantity	Date of Measure
This label, and all labels concerning the Radioactive Isotope contained in this device, shall be maintained in a legible condition				
Removal of this label is Prohibited				

If you have any questions or if I can be further service, please do not hesitate to call.

Sincerely


James L. Wagner
President & RSO
Sensor Services, Inc.

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(9) Labeling.

- * Each existing AccuRay source and source housing has at least three different tags.
- * Metal tag, approximately 3" X 1 2/2" stating:

<p>"Caution Radioactive Material" (With Radiation Logo) The Isotope & Quantity Date of Measure Manufacturer Serial Number</p>
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NOTE: The exact wording may vary depending on when the tag was issued.

This tag is riveted to the bottom of the actual source holder and can only be seen by disassembly of the source housing side covers.

THIS TAG WOULD REMAIN. If missing, it would be replaced.

- Metal tag, approximately 3" x 2 3/8" stating:

<p>Regulatory Conditions</p> <p>The receipt , possession, use and transfer of this device are subject to a General License or the equivalent and the regulations of the U.S.NRC or a state with which the NRC has entered into an agreement for the exercise of regulatory authority.</p> <p>Abandonment or disposal prohibited unless transferred to persons specifically licensed by the NRC or an agreement state.</p> <p>Operation prohibited if there is indication of failure of, or damage to, containment of radioactive material.</p> <p>Installation, dismantling, relocation, repair or testing shall be performed by persons specifically licensed by NRC or an agreement state.</p> <p>Device shall be tested for leakage of radioactive material and proper functioning of the on-off mechanism and indicator, if any, at intervals specified on the attached yellow label.</p> <p>Removal of this Label is Prohibited</p>
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NOTE: Some older tags may have AEC in place of USNRC, if so it will be replaced. The exact wording may vary depending on when the tag was issued.

This tag does not declare the manufacturer. One or more of these tags is riveted to the external area of the source housing.

THIS TAG WOULD REMAIN. If missing it would be replaced. If the customer chooses to, or was required to obtain a Specific License, then it would be omitted.

(9) Labeling. (Continued)

- * Metal Tag, approximately 3" x 2 3/8" stating

"Caution Radioactive Material" (With Radiation Logo)	
Housing Model _____	Holder Model _____
The Isotope & Quantity Date of Measure	
Test Interval Isotope Serial Number	
Removal of this label is Prohibited	
Do not continuously occupy the area within _____ feet of this unit	

NOTE: The exact wording may vary depending on when the tag was issued.

THIS TAG WOULD REMAIN. If missing, it would be replaced.

- * Metal Tag, 4 1/4" x 2 1/4" stating

"Caution Radioactive Material"			
This unit was redistributed and installed by <i>Sensor Services, Inc.</i> , under USNRC License # _____			
Installation date: _____		Test Interval: _____	
Isotope	Isotope Serial #	Quantity	Date of Measure
This label, and all labels concerning the Radioactive Isotope contained in this device, shall be maintained in a legible condition			
Removal of this label is Prohibited			

The tag would be installed by using either screw in rivets, small screws or glued on with a epoxy type paste.

B. Information Furnished to General Licensees:

Upon completion of an installation and before the system can be officially placed in operation, a meeting with the designated plant Radiation Safety Officer will be convened to cover the following:

- * Presentation of a copy the installation forms, SSI Form 40, concerning the Generally Licensed Isotope now installed in the customers plant. This document is to be signed by the customer and the SSI field representative.
- * Presentation and signing of SSI Form 39, Notice of Receipt of Generally Licensed Device.
- * Presentation of completed SSI Form 9, Licensed Device Initial Inspection.
- * Review of the rules and regulations concerning the use and customer restrictions with the Isotope. This includes the six month inspection and prohibition on non licensed maintenance of the Isotope.
- * Explanation of the Leak Test requirements, their reason, value and results.
- * A copy a the General License contained in Art. 31.5, USNRC Rules & Regulations (General Domestic License for Byproduct Material) or the equivalent Agreement States Rules & Regulations.
- * The requirement for keeping records in a separate file.