

KUFFERATH

May 10, 2005

FAX: 610-337-5269 (2 pages total)

U.S. NRC REGION 1
475 Allendale Road
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ATTENTION: Ms. Brenda Brown/ Ms. Judy Joustra

SUBJECT: Your April 28th, 2005 inspection.

This is to confirm that the following have been addressed since your April 28th inspection of our facility in Thorofare, NJ.

- 1. Hazmat training certificate / requirements**
 - a. The supplier's RSO responded to this yesterday. Here is his answer: "The training that you received at NDC is the manufacturer specific training that is required as per NUREG 1556 Vol 1. If you ship the gauge as per how you were trained (49 CFR 173.4), you will see that DOT Hazmat training is not required as the shipment is an exempt quantity. You do however must still meet all other requirements of UN2911."
 - b. Regarding UN2911, we purchased and installed locks on April 28th for the source cap, the carrying case, and the storage shed (at the temporary storage facility). The storage shed was purchased April 29th and fixed to the shop floor May 2nd. I had moved the NDC 104pc gauge to a locked closet on the 28th after your inspection. I will personally move the gauge to the new storage shed the next time I'm at the facility. Also, the typographical error on the carrying case identification sticker was corrected on April 28th as well.
- 2. Your questions about the film badge.**
 - a. The supplier's RSO responded to this yesterday. Here is his answer: "Yes, this evaluation has been done. A badge is not required as under normal operating conditions, it is unlikely for an operator of the gauge to exceed 10% (500millirem) of the legal dose limit (5000millirem)."
- 3. The survey meter.**
 - a. The supplier, NDC, has forwarded me information about a small portable version of this device. We plan to purchase one of these devices this week.
- 4. Gauge parts inventory.**
 - a. My view here, as was on April 28th, is that this has been completed within every 6 month period. It done by me as well as the gauge

supplier (along with leak tests), NDC Infrared Engineering, each time it was sent to their facility for repairs. Nevertheless, I will issue a memo for our records, indicating that it will be necessary as a compliance issue in the future and should be documented accordingly.

5. 10 CFR Parts 19 and 20

- a. Per your suggestion we will include a copy of these in the temporary site informational binder.
- b. We will continue, as always, to carry 71, 19, and 20 in within the gauge carrying case at all times.

6. Bungy cords for securing the case during transport.

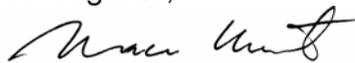
- a. These were purchased on April 28th and are available the next time I will be transporting the gauge. I should note here that I may not have made it clear to you that the SUV type trucks that I rent exclusively for gauge transportation have in most cases a securing system already in place for the gauge in the cargo hold.

The NDC Infrared Engineering RSO told me that he would be glad to answer any additional questions that you may have regarding his statements. His contact information is as follows:

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Repair Department Supervisor
Radiation Safety Officer
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Please call me at any time should you have any additional questions.

Best regards,



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