

July 20, 2005

ALL AGREEMENT STATES, MINNESOTA, PENNSYLVANIA

**INCORPORATION OF REGULATORY ISSUE SUMMARY 2005-10 INTO NUREG-1556,
VOLUME 2, GUIDANCE FOR INDUSTRIAL RADIOGRAPHY LICENSES (STP-05-056)**

NRC has incorporated Regulatory Issue Summary (RIS) 2005-10, "Performance-Based Approach for Associated Equipment in 10 CFR 34.20" (June 10, 2005), into NUREG-1556, Volume 2, Consolidated Guidance for Materials Licenses, Program Specific Guidance about Industrial Radiography Licenses (August 1998). 10 CFR 34.20 requires licensees to use industrial radiography equipment that meets specific performance requirements. RIS 2005-10 addresses acceptable methods to demonstrate that associated equipment complies with 10 CFR 34.20. The errata sheets for NUREG-1556, Volume 2, indicate the changes on page 8-4 in Enclosure 1. RIS 2005-10 has replaced and superceded Information Notice 96-20, "Demonstration of Associated Equipment Compliance with 34.20" (April 4, 1996) in Enclosure 2 as "Appendix F" (ADAMS Accession No. ML051590049).

Page 8-4 was revised to indicate that a source assembly includes the sealed source and the connector that attaches the source to the control cable. Additionally, the revision removes statements indicating that associated equipment must be specifically approved or registered by NRC or an Agreement State. Instead, the guidance states that manufacturers and distributors of industrial radiography equipment may voluntarily include the items of associated equipment that were used in the industrial radiography system with their sealed sources and devices that are registered under 10 CFR 32.210. To include associated equipment in the certificate of registration, the vendor's application must include documentation that demonstrates the associated equipment meets the minimum criteria in 10 CFR 34.20 and is compatible with the sources and devices. Licensees may only make modifications to associated equipment if the design safety features of the system are not compromised.

Appendix F (RIS 2005-10) alerts licensees to accurately identify the presence of associated equipment. For example, the portion of the connector that is attached to the end of the control cable is actually a component of the source assembly and is subject to the safety evaluation that must be completed by NRC or an Agreement State before the source assembly may be specifically authorized for use by a licensee. RIS 2005-10 also contains a number of ways that licensees can demonstrate that the associated equipment meets the performance requirements stated in 10 CFR 34.20.

On December 28, 2004, we invited the Agreement States to comment on the draft RIS (see STP-04-085). Three Agreement States provided 11 comments. NRC agreed with 5 of the comments which were included in the RIS. State programs should adopt the errata sheets and disregard previous versions of page 8-4 and Appendix F

If you have any questions regarding this correspondence, please contact me or the individual named below.

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Enclosures:

1. NUREG-1556, Volume 2, page 8-4
2. NUREG-1556, Volume 2, Appendix F

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