



Nuclear Underwater Equipment
SALES AND SERVICE

Developed by Nuclear Professionals

July 29, 2005

Mr. Jim Schmidt
US Nuclear Regulatory Commission
Nuclear Materials Safety and Safeguards
Materials Licensing Section
475 Allendale Road
King of Prussia, PA 19406

MS 16

J-8

44-30912-01

03036563

RE: R.O.V. Technologies, Inc., License Amendment, Control No. 137008

Dear Mr. Schmidt:

ROV appreciates your interest and efforts in addressing the issues in your letter dated (insert letter date). Based on our phone conversation yesterday, ROV provides the following clarifying information relative to your numbered questions and our response of July 25, 2005.

1) The following activities are requested and will be conducted in the areas as identified. All four of the areas are within the restricted area. ROV shall not routinely sort, consolidate, or repackage materials in any area as a service for customers.

Maintenance Enclosure – All activities on equipment with greater than 100 dpm/100 cm² alpha or 5000 dpm/100 cm² beta-gamma must be conducted in this area.

Contamination Control Area (CCA) – The CCA is for the storage of equipment and maintenance. Maintenance will only be performed on equipment with removable surface contamination not exceeding 100 dpm/100 cm² alpha or 5000 dpm/100 cm² beta-gamma. Outer packages and unpackaged equipment identified with loose contamination greater than 20 dpm/100 cm² alpha and 200 dpm/100 cm² beta-gamma must be stored within the Contamination Control Area.

Lease Storage Area – The lease storage area is for the storage of materials and routine transfer of materials within the lease storage area and to the CCA. Removable contamination on packages, inner containers, unpackaged equipment, and all accessible surfaces is limited to 20 dpm/100 cm² alpha and 200 dpm/100 cm² beta-gamma. Only under the supervision of the RSO may

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transfers of material occur when contamination levels exceed those specified. In these instances, if any, the RSO shall prescribe radiological controls and contamination, both removable and fixed, and dose rate surveys shall be performed immediately following completion of such transfers. Maintenance activities involving licensed material will not be performed in this area.

Fenced Truck Storage Area – All radioactive materials in this area must be stored in securely closed shipping containers and vehicles. Surveys and loading or unloading of materials not exceeding 20 dpm/100 cm² alpha and 200 dpm/100 cm² beta-gamma may occur in this area. Maintenance activities involving licensed material will not be performed in this area.

- 2) ROV shall not expand the size of the CCA at this time.
- 3) No further information requested.
- 4) With regard to financial viability of any non nuclear utility customers, ROV shall confirm their financial viability annual through a review of their payment history for storage services.
- 5) Only packages and unpackaged equipment, with removable contamination not exceeding 20 dpm/100 cm² alpha and 200 dpm/100 cm² beta-gamma shall be stored in the lease storage area. Removable contamination levels will be determined on each package or item, at a minimum, upon receipt and during each annual inventory. Further if removable contamination is identified above these levels during routine area surveys, the source of the contamination will be investigated and actions taken to prevent recurrence.
- 6) No further information requested.
- 7) Personnel monitoring requirements will be the same for individuals exiting the contamination control (the CCA completely surrounds the maintenance area) and lease storage areas. Individuals shall perform a whole body frisk commensurate with the activities conducted while in the areas. Personnel monitoring for individuals who did not come into contact with any radioactive materials may limit surveys, at a minimum, to hands and feet. Personnel monitoring is conducted with a Bicon FriskTech with a B-50 probe or instrument with similar capabilities. Any personnel monitoring results discernable from background is investigated and decontamination performed as necessary. There are no personnel monitoring requirements for the fenced truck storage area.



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Area survey frequencies are depicted in the following table. All surveys include dose rate readings and removable contamination assays unless otherwise identified.

Area Designation	Frequency			Comments
	Daily	Weekly	Monthly	
Maintenance	X			When work is conducted ¹
CCA		X		When RAM is handled ¹
Lease Storage			X	Weekly when packages/materials are transferred and as identified above.
Fenced Truck Storage			X	Contamination surveys on packages, if present.
Other			X	Remainder of the warehouse and office.

¹At lease monthly, in the event no work or RAM handling.

Materials transferred outside of the CCA and lease storage area will be monitored for unrestricted release. Vehicles transporting radioactive materials will be surveyed in accordance with all DOT requirements prior to leaving the fenced truck storage areas.

8) Sorting, consolidating, and repackaging will not be routinely conducted.

If you have any further questions, please contact us at your earliest convenience.

Sincerely,

John J. Judge, Jr.
 President/CEO

cc: Tim McCarthy, RSO