



3. Section 6 renewal application, Item 3, of your application for renewal, you requested Ir-192, Sealed Source Model G-60 and SPEC Model T-5F with a SPEC-150 exposure device. The authorized source changers with this combination are SPEC Model C-1, AEA 650L and INC Model IR-50, as requested. However, I was not able to determine through the SSDR, that the Tech Ops Model 500SU was an authorized source changer for either the G-60 or SPEC Model T-5F sealed source.

Based on our telephone conversation, I understand that you do not have Tech Ops Model 500SU source changer and therefore, I will remove it from your license.

No response required.

4. Section 7 renewal application ~ locations of authorized use
  - a. Based on our telephone conversation, I understand that the unit number located at 6741 Sprinkler Road, Portage, Michigan, is Unit # 819.  
No response required.
5. Section 7 renewal application ~ permanent radiographic facility
  - a. Please justify why the measured results for the Iridium survey is significantly different from the calculated results for Booth 1. Additionally, the date of the survey is for 1994, please submit more current survey data.
  - b. Please clarify if the permanent radiographic facility is located in an industrial park, office complex or open field.
6. Section 8 renewal application ~ personnel training and certification
  - a. Your license renewal application indicates that the passing grade is 75%. However, NRC guidance recommends 80% as the passing grade. Please justify your use of 75%. Based on our telephone conversation, I understand that you have changed the passing grade to 80% and will resubmit the training procedure.
  - b. Please see attached mark-up of practice exams.
7. Section 10 renewal application ~ ROEM  
Please commit to making the following changes to your Operating and Emergency Procedure or otherwise, please provide justification.
  - a. Chapter 2, Section 2.0, Distribution, should also include the requirement to distribute applicable regulations, as required by 34.43 (b)(1) and 34.43 (c)(1).
  - b. Chapter 4, Section 1.1.8 should insert "or" between State and Nuclear Regulatory Commission.
  - c. Chapter 6, Section 5.2., Item 2, "Note" only lists some of your exposure devices for Ir-192 and Co-60. Either insert "e.g.," prior to the examples of exposure devices or list all authorized exposure devices.

- d. Chapter 7, Section 2.0, Item 14, only provides a partial list of authorized exposure devices. Each exposure device is required to have an operating procedure.
  - e. Chapter 9, Section 1.0, Item 1.4, 4th bullet, should reflect "state or NRC" ...
  - f. Chapter 11, Form 4, the vehicle survey should indicate "mR/hr"
8. Section 11 renewal application ~ Inspection and Maintenance of Radiographic Exposure Devices
- a. 10 CFR 34.31 (b) states in part that licensee shall have written procedures for inspection and maintenance of exposure devices, source changers, associated equipment...

The review of Section 11, identifies procedures for IR-100 exposure devices and the Amersham 660 and 880 Series. However, I was not able to locate procedures for the other exposure devices and source changers which are requested to be authorized.

Based on our telephone conversation, I understand that you do not have SPEC Model 150, but you would like the exposure device to remain on your license for business purposes. Please commit to providing the necessary procedures to the NRC, prior to implementing the use of the SPEC Model 150.

Further, I understand that you only perform quarterly preventative maintenance on exposure devices as authorized by the manufacturer in the SSDR or manufacturer operating manual, and that any maintenance of the exposure device is performed by the manufacturer.

9. Section 12 renewal application ~ Transportation and Shipping Radioactive Materials

- a. Section V, Determining the Proper Shipping Name

The example provided is no longer an authorized proper shipping name, please update the procedure. (The review did recognize that the "Shippers Declaration for Dangerous Goods" form indicated the proper shipping name.)

- b. Section VII, Determining the Package Marking Requirements

The example for marking does not provide an authorized proper shipping name, please update the procedure.

The gross weight needs to include the unit of measure.

The marking needs to include a radiation symbol, 49 CFR 172.310(d)

c. Section VIII, Labeling the Package

May want to clarify the labeling on an overpack as required by 49 CFR 172.403(h)

d. Section IX, Prepare the Shipping Papers

Clarify the proper shipping name,  
Update Shipper's Certification statement in accordance with 49 CFR 172.204