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37-31124-01
03037122

Mr. Mike Reichard
Nuclear Regulatory Commission
475 Allendale Rd.
King of Prussia, Pa. 19406

February 21, 2006

Mr. Reichard,

Thank-you for taking time to convey to us, the questions and concerns of your review team this morning.

Pursuant to the concern about access by unauthorized users to the isotopes during periods of inactivity at the designated work station. It is our plan to have all three sealed sources locked into their associated shielded test fixture. The access door to the isotope on each fixture has been fitted with a lock preventing direct access to the source. The keys will reside with the RSO. Each fixture will be affixed to the workstation table such that no fixture could be easily removed and carried off without being confronted by an area supervisor.

I have been able to obtain clarification to the question about which model number source matches up with the two registry documents that have been provided. Document number CA406S122S is related specifically to the source CS-137 which is housed in a #3015 capsule, and the source CF-252 which is housed in a #3024 capsule. Document CA0406S106S is specifically related to the source AM-241 which is described as a gamma disc source.

I have also updated and enclosed pages C9, C23, C24, and C27 as we discussed. Thank-you again for all of your efforts, they are greatly appreciated.

Douglass L Sturtz

Douglass L Sturtz
RSO

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NMSS/RONI MATERIALS-002

APPENDIX C

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
5	<p>RADIOACTIVE MATERIAL</p> <p>Financial Assurance and Recordkeeping For Decommissioning</p> <ul style="list-style-type: none"> Pursuant to 10 CFR 30.35(g), we shall maintain drawings and records important to decommissioning and transfer these records to a new licensee before licensed activities are transferred, or assign the records to the appropriate NRC Regional Office before the license is terminated. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> If financial assurance is required, submit evidence. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>

APPENDIX C

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	RADIATION SAFETY PROGRAM (Cont'd)				
	Operating and Emergency Procedures (Cont'd)				
	• Procedures for identifying and reporting to NRC defects and noncompliance as required by 10 CFR 21.21(a) of this chapter.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	• Procedures and actions to be taken if a sealed source is ruptured, including actions to prevent the spread of contamination and minimize inhalation and ingestion of licensed materials and actions to obtain suitable radiation survey instruments.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	• Instructions for the proper storage and disposal of radioactive waste.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	• Procedures to be followed in the event of uncontrolled release of radioactive unsealed licensed material to the environment, including notification of the RSO, NRC, and other Federal and state agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	• Procedures for identifying and reporting to NRC defects and noncompliance. See Table 8.4, which describes the typical incident notifications required by NRC regulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

APPENDIX C

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	RADIATION SAFETY PROGRAM (Cont'd)				
	Surveys				
	<ul style="list-style-type: none"> • "We will survey our facility and maintain contamination levels in accordance with the survey frequencies and contamination levels published in NUREG-1556, Vol. 18, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses,' dated November 2000." 	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	OR				
	<ul style="list-style-type: none"> • Submit description of alternative method for demonstrating how to evaluate a radiological hazard. 				<input type="checkbox"/>
	Leak Tests				
	<ul style="list-style-type: none"> • "Leak tests, when required by the license, will be performed at intervals approved by NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide leak testing services to other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions." 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	OR				
	<ul style="list-style-type: none"> • "Leak testing will follow the model procedures in Appendix O of NUREG-1556, Vol. 18, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses,' dated November 2000." 	<input type="checkbox"/>	<input type="checkbox"/>		

APPENDIX C

Item No.	Title and Criteria	Yes	No	N/A	Description Attached
10	<p>RADIATION SAFETY PROGRAM (Cont'd.)</p> <p>Transportation</p> <p>No response is needed from applicants during the licensing phase.</p> <p>Waste Management</p> <ul style="list-style-type: none"> • "We will use the model waste procedures published in Appendix N of NUREG-1556, Vol. 18, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses,' dated November 2000." • If the applicant wishes to use only selected model procedures, provide a statement that: "We will use the (specify either: (1) Decay-In-Storage; or (2) Disposal of Liquids Into Sanitary Sewerage) model waste procedures that are published in Appendix N of NUREG-1556, Vol. 18, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Service Provider Licenses,' dated November 2000." <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Provided are procedures for waste collection, storage, and disposal by any of the authorized methods described in this section. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • If access to a radioactive waste burial site is unavailable, the applicant should request authorization for extended interim storage of waste. Applicant should refer to NRC IN 90-09, "Extended Interim Storage of Low-Level Radioactive Waste by Fuel Cycle and Materials Licensees," dated February 1990, for guidance if extended storage is required. 	No Response is Necessary for this Section			
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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