

May 5, 2006

MEMORANDUM TO: Tim Harris, Section Chief  
Materials Safety and Inspection Branch, IMNS

FROM: Nima Ashkeboussi /RA/  
Materials Safety and Inspection Branch, IMNS

SUBJECT: SUMMARY OF MEETING WITH THE DEPARTMENT  
OF THE ARMY, MAY 2, 2006

Representatives from the Army, Navy, and Air Force requested a meeting with NRC staff on May 2, 2006, to discuss an upcoming request to change the status of two licensed products. The Army currently holds Sealed Source and Device (SSD) registry sheets NR-1129-D-101-S and NR-1129-D-103-S for two air monitoring detectors that are specifically licensed devices. Their request would be to have the devices changed to products that are exempt from licensing.

The Army addressed the following issues to demonstrate the devices could be distributed as exempt products:

- design of the device, including historical performances for leak testing and safety; and
- an analysis in accordance with NUREG 1717, to demonstrate that the dose is insignificant.

The NRC participants outlined to the Armed Forces representatives that:

- that the devices would have to meet the provisions of NUREG-1556, Vol. 8 and 10 CFR 32.26;
- exempt products must not have any handling of the radioactive material, currently the devices require that the drift tube assembly be taken out and replaced; and
- exempt product sources must be in a tamper proof housing.

The presentation did not address why the Army was requesting a change in the licensing status because the Army, Navy, and Air Force stated they would be handling the material in the same exact way if the licensing status became exempt. However, when discussing the reasons for the request, financial costs of the SSD's, reduction of regulatory burden, and reduction of device accountability were listed.

Discussions with the Armed Forces and NRC Staff yielded multiple possible options to achieve the desired outcome. The options included:

- amending the SSD certificates to exempt products, which would require a NUREG 1717 analysis and design change to prevent removal of source housing;
- amending the SSD certificates to generally licensed products, which would require labeling changes and requirement for leak testing;
- inactivating the SSD registration certificates and adding each device to each Armed Forces specific license; and
- add license conditions to each specific license to ease the burden the device accountability requirements.

Some of the discussed options would require Regional action. NRC Staff requested that any option be submitted simultaneously to the appropriate office.

Participants:

NRC Staff:

Thomas Essig	Bruce Carrico
Tim Harris	Anthony Kirkwood
John Jankovich	Maria Schwartz
Nima Ashkeboussi	Susan Chidakel
Tomas Herrera	

Armed Forces:

Thomas Gizicki, US Army	Marvin Earles, US Navy
Robert Prins, US Army	Rham Bhat, US Air Force
Lino Fragoso, US Navy	

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