



DEPARTMENT OF THE ARMY
UNITED STATES ARMY TACOM LIFE CYCLE MANAGEMENT COMMAND
1 ROCK ISLAND ARSENAL
ROCK ISLAND, ILLINOIS 61299-7630

0 2 OCT 2006

REPLY TO
ATTENTION OF

US Army TACOM LCMC
AMSTA-CS-CZR
Rock Island, IL 61299-7630

Mr. Loren Hueter
U.S. Regulatory Commission, Region III
2443 Warrenville, Road, Suite 210
Lisle, IL 60532-4352

SUBJECT: Request for Technical Assistance Concerning Converting
Specific licensed ICAM's, GID-3's to Generally Licensed ICAM's and
GID-3's

Dear Mr. Hueter,

In order to improve the security of Department of Defense installations, a Department of Defense joint program was formed called Joint Program Management Guardian Installation Protection Program (JPM IPP) in Falls Church, VA. The JPM Guardian IPP mission falls outside the realm of the war fighter for which the specific NRC license was obtained for subject licensed devices. The JPM Guardian IPP's mission is to field a number of chemical detection devices at various Army, Navy, and Air Force installations beginning in CY 2006 and ending in CY 2007.

The U.S. Army TACOM Life Cycle Management Command (LCMC) believes that the chemical detectors for the JPM Guardian IPP should be distributed as a generally licensed device and not as a device covered under TACOM LCMC's specific NRC license. TACOM LCMC believes that control of these devices is the responsibility of persons possessing them, ie., Department of Defense first responders, fire departments, and security personnel at the various installations throughout the United States. The responsibility for complying with the general license requirements is the users responsibility.

Some of the Army's specifically licensed ICAM's and GID-3's have mistakenly been distributed by Science Applications International Corporation (SAIC) Abington, MD., for the JPM Guardian IPP. SAIC has an agreement state license to store and distribute the devices to specific licensees (MD-25-051-01). In addition, SAIC has distributed a few Army ICAM's and M22's to Navy installations. The licensee has halted the distribution of these devices until the licensing issue is resolved.

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TACOM LCMC would like to return custody of the 66 devices that have been distributed by SAIC to Smiths Detection Inc. specific NRC license (MD-25-044-01) for re-labeling to a generally licensed device under the provisions of 10 CFR Part 31.5. The licensee will request Smiths Detection Inc. convert the specifically licensed devices (ICAM, M22, GID-3 24/7) to generally licensed devices, which will involve applying the general license label to each of the 66 chemical detection devices. All future distribution of the ICAM and GID-3's (M22's and GID-3 24-7) by Smiths Detection/SAIC for JPM Guardian IPP should be under a general license. If these devices can be converted to a general license, the licensee requests from the NRC to have the 6 month leak test waived for the Department of Defense per part 31.5(c). The licensee's rationale for requesting a waiver from leak testing is that the drift tube module containing the Ni63 sealed source is the same in the general and specifically license ICAM and GID-3's. In addition, the design of the Ni 63 sealed source contained in the drift tube module has proven its integrity over the years of service operating in extreme environments. The JPM Guardian IPP detectors will not be maintained by the Department of Defence.

The licensee TACOM-RI requests a concurrence from the NRC that would allow Smiths Detection Inc. to convert the fixed number of Army's specifically licensed ICAM's (17 ea) GID-3 M22's (33 ea) and GID-3 24/7 (16 ea), already issued to Army installations, to a general license. The devices are manufactured and distributed by Smiths Detection Inc., under agreement state license MD-25-044-01. The differences between the specific and generally licensed device is the physical appearance, i.e, color, general license label, Army serial number prefix, and different chemical agent sensing capabilities. They contain the same Ni63 sealed source. The request only applies to the JPM Guardian IPP devices.

The POC for further information is Mr. Thomas Gizicki, TACOM LCMC Health Physicist, NRC license RSO, 309-782-2965.

Sincerely,

JEFFREY HAVENNER
Chief, TACOM-RI Safety

CF:
Nuclear Regulatory Commission
Materials Safety and Inspection Branch ATTN: Mr. Tomas Herrera
Division of Industrial and Medical Nuclear Safety
Office Nuclear Materials Safety and Safeguards
Washington, D.C., 20555-0001

US Army TACOM Life Cycle Management Command, AMSTA-CS (Mr.
George Jarvis) 6501 E 11 Mile Rd, Warren, MI 48397-5000

DEPARTMENT OF THE ARMY

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