



**Agilent Technologies**

2850 Centerville Road  
Wilmington, DE 19808

NMSB2

Director  
Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road,  
King of Prussia, PA 19406

03032982

Re: Amendment Request to NRC License 07-28762-02G

June 7, 2007

Dear Sir or Madam,

I. Per information provided in our letter dated April 2, 2007 (copy included), Agilent Technologies, Inc. requests the following changes:

- Increase the “Maximum Activity Per Source” values listed in line 11 of the above referenced license for Models G1223A and G1533A Detector Cells from 15 millicuries to 18 millicuries. This amendment is necessary to properly reflect the maximum activity of cells currently in the field as models G1223A, and G1533A are now obsolete and out of product support. As noted in the letter dated April 2, 2007, Agilent has notified customers in its electronic data base and relevant agencies of the issue.
- Add the following obsolete model numbers to the referenced license in order to account for devices being returned from customers for disposal or transfer to other locations. Agilent Technologies, Inc. no longer manufactures these parts for sale. Isotope, source model number, and maximum activity per source are listed in item II below:
  - 18713A
  - 18803
  - 19282
  - 19303
  - 19312

II. Secondly, we have identified an issue of concern with the information provided in line 11 of the above referenced license. We question the information posted under the column headings “Isotope” and “Source Model Number” as it seems inconsistent with actual data and very different from license revisions prior to this company’s license renewal in October of 2002. Prior to the renewal, the information under Isotope was either “Nickel 63” or “Hydrogen 3” depending on the plated source and the information under Source Model Number (listed simply as “Source” in earlier revisions) was “Plated source”. It is our opinion that the correct information in line 11 (including the additional model numbers as noted above) should read:

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NMSS/RGN1 MATERIALS-002

<u>Device Model Number</u>	<u>Isotope</u>	<u>Source Model Number<sup>1</sup></u>	<u>Maximum Activity Per Source</u>
Model 19233 Detector Cell	Nickel 63	NBCD	18
Model G1223A Detector Cell	Nickel 63	NBCD	18
Model G1533A	Nickel 63	NBCD	18
Model G2397A Detector Cell	Nickel 63	NER-004P	15
Model 18713A Detector Cell	Nickel 63	NER-004/NER-004P <sup>2</sup>	15
Model 18803 Detector Cell	Nickel 63	NER-004/NER-004P	15
Model 19303 Detector Cell	Nickel 63	NER-004/NER-004P	15
Model 19282 Detector Cell	Nickel 63	NER-004/NER-004P	15
Model 19312 Detector Cell	Nickel 63	NER-004/NER-004P	15

<sup>1</sup>Plating manufacturer's model numbers

<sup>2</sup>Records for models designated NER-004/NER-004P are not accessible on site. Designation based on best understanding of historical information

Please contact David S. Bennett (RSO) at 302-633-8262 if you have any questions about the details of this amendment request.

Thank you,



Keith Morgan  
LFS/LSCA Environmental, Health, and Safety Manager



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Re: Additional information to Letter of Commitment dated September 18, 2006.

April 2, 2007

Dear Sir or Madam,

One of the action items identified in the Letter of Commitment referenced above was to notify customers holding models 19233 and 19235 of the fact that the sources in those devices could contain a maximum of 18 millicuries. That commitment was met during the week of October 16. However, this office became aware of two other ECD models (G1223A and G1533A) that were derivatives of the 19233 in that some model 19233's were purchased from the vendor plating with a maximum of 18 millicuries and the model number changed to either G1223A or G1533A after arrival for marketing or sales purposes.

Agilent Technologies, Inc. has worked with the vendor and internally to ensure no other models are involved. Agilent has notified all U.S. customers identified in its data base as owning G1533A's (which dates to 1995) as well as their Agreement State agencies. There were no models G1223A identified in those records as ever having been distributed within the U.S.

Neither models G1223A or G1533A will be distributed within the U.S. as of this date. An amendment request to remove them from Agilent's distribution license will be forthcoming.

Please contact the Radiation Safety Officer, David Bennett, at 302-633-8262 for further information.

Sincerely,

Keith Morgan  
LFS/LSCA Environmental, Health, and Safety Manager

This is to acknowledge the receipt of your letter/application dated

6/7/2007, and to inform you that the initial processing which includes an administrative review has been performed.

- AMEND. 07-28762-026  
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.
- Please provide to this office within 30 days of your receipt of this card
- 

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 140618.  
When calling to inquire about this action, please refer to this control number.  
You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI)  
(6-98)

Sincerely,  
Licensing Assistance Team Leader