



10/15/200

Facsimile Transmittal

Innovators in Instrumentation Technology

➤ **To: Ms. Toyé Simmons**

Fax : 630-515-1078
Phone: 630-829-9842

➤ **From: Ali Regimand**

Fax : 919.875.8328
Phone: 919.875.8371

➤ **Pages** 11 with cover

➤ **Subject** Control Number 316429

Message

Ms. Simmons,
Please call me if you have any questions.
Best regards
Ali Regimand

I N N O V A T O R S I N I N S T R U M E N T A T I O N T E C H N O L O G Y

October 15, 2007

Ms. Toye Simmons
US Nuclear Regulatory Commission
2443 Warrenton Road
Lisle, IL 60532-4352

Re: Docket No. 03037525, Control No. 316429

Dear Ms. Simmons:

Thank you for your response to our new Grand Rapids, MI license application. I have addressed your questions and comments in the following paragraphs:

- 1- We would like to specify temporary job sites as a location of use in our license. On rare occasions, we will be carrying gauges to the field or to a customer site for testing. We will comply with all applicable rules and regulations, while transporting gauges to and from temporary job sites. Gauges will be under constant surveillance during transportation. We will use two separate locked barriers, when gauges are not in use at temporary job sites and during transportation.
- 2- The activity of thorium-230 stated on the source calibration sheet is accurate. The thorium source used for calibration and verification of the leak test system is 0.017 micro curies.
- 3- Appendix 7, "Receipt of RAM packages", more appropriate wording should have been used in this area. We are not seeking any exemptions from any of the regulations. What we were trying to point out was that during receipt of gauges from our clients, on a temporary transfer basis for repair or calibration, we automatically perform a "Go/No Go" screening leak test. We perform this step to make sure we do not check gauges into our facility that may be contaminated. If the gauge passes the screening leak test, we do not keep the screen test results, other than indicating on our repair order that the gauge has passed the screen test.

Please ignore the sentence in this section asking for an exemption. Customers are ultimately responsible for leak testing their own gauges, under their material license. We will continue leak testing gauges that belong to InstroTek, under the requirements of our license.

- 4- We will commit not to have more than 500 mCi of Cs-137 and 2 Ci cumulative of Am241:Be, Fifty total gauges at any time during the year.



Please note, based on the experience we have gained from our other service facilities, maximum of twenty gauges (200 mCi Cs-137, 800 mCi Am241:Be) are being worked on at the facility, at any given time. We keep an average turn around time of five days on gauges. Therefore, any given gauge is kept at our facility approximately 5 days, before shipment back to the customer.

- 5- Organizational chart attached
- 6- Letter attached from Emil Albouyeh the proposed RSO
- 7- Training documentation and requirements are attached. Please note most of the training for the new technicians will be done at a senior technicians work bench and work area. Other training is performed in a training class or work area relevant to the specific training that is being provided. The trainee has constant access to a trainer and senior technician at all times.
We provide on-going training to all our technicians, as new regulations are introduced and as new product/services are launched.
- 8- All forms used in this office will have the Grand Rapids, Michigan address and information. Inventory is usually performed by the technician or the local RSO, once every six months. Company wide, we conduct our inventory every February and August. The corporate RSO, reviews and signs off on inventory performed in each InstroTek service facility.

I appreciate your assistance in this matter. Please do not hesitate to contact me, if I can provide any other information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ali Regimand', with a large, stylized flourish at the end.

Ali Regimand
President & Corporate RSO

INSTROTEK, INC.

NEW LICENSE: 32-32666-01 DOCKET NO. 03037525 CONTROL NO. 316429

CONTACT: ALI REGIMAND 919-875-8371

Mr. Regimand, I have reviewed your application for a new service license. The following items must to be addressed in writing before I can complete my review:

1. Your application did not specify temporary job sites as a location of use. Will you need this designation on your license?
2. Your application contains conflicting information regarding the activity of the thorium-230 calibration source. In one place the activity is stated as 0.010 millicuries but the certificate of calibration states 0.0170 micro curies. Please specify the actual activity of this source.
3. In Appendix 7 of your application under "Receipt of RAM packages", you requested an exemption. All requests for exemptions to the regulations must not present an undue risk to public health and safety and must be consistent with the common defense and security.

The exemption request must be accompanied by:

- A description of the proposed exemption and the reason why it is needed;
 - A description of specific compensatory safety measures that will provide a level of protection equivalent to the regulation for which the proposed exemption is being requested; and
 - A discussion of reasonable alternatives that have been considered.
4. Please indicate a maximum quantity of each radionuclide you intend to possess.
 5. Please provide an organizational chart that includes the proposed Grand Rapids facility.
 6. Please have the proposed RSO call me at 630-829-9842 or provide a written statement signed by you and the proposed RSO confirming that this individual is willing to act as RSO for the Grand Rapids office and that he understands the duties and responsibilities of the position.
 7. It appears that you did not address training for InstroTek's future authorized users and ancillary personnel. Please provide a description of the training and experience for your future staff (Individuals working in or frequenting restricted areas). For guidance please see NUREG-1556, Vol. 18, pages 8-18 to 8-21, and Appendix H. You can access this NUREG by GOOGLE or nrc.gov.
 8. Misc: Please note that some of the forms submitted with your application identify Las Vegas. Please confirm that forms germane to Grand Rapids will be identified as such. Additionally, please add the name of the individual performing the inventory to your form.

Please respond in writing to the above by October 17, 2007 and fax your response to me at 630-515-1078. Please include your control number 316429. **If your response is not provided in the allotted time, this action will be voided without prejudice.** Upon receipt of your response this action will be reinstated. If you have any questions regarding the above please call me at 630-829-9842.

Toye L. Simmons

Toye L. Simmons

10/10/07

Date

I N N O V A T O R S I N I N S T R U M E N T A T I O N T E C H N O L O G Y

October 12, 2007

Ms. Toye Simmons
US Nuclear Regulatory Commission
2443 Warrenville Road
Lisle, IL 60532-4352

Dear Ms. Simmons:

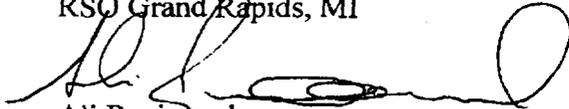
I am the proposed RSO for InstroTek's Grand Rapids, Michigan facility. I would like to confirm that I am willing to act as RSO for this facility and I understand the duties and responsibilities related to this position.

Thank you for your assistance. Please do not hesitate to contact me, if I can be of any assistance.

Sincerely,



Emil C. Albouyeh
RSO Grand Rapids, MI

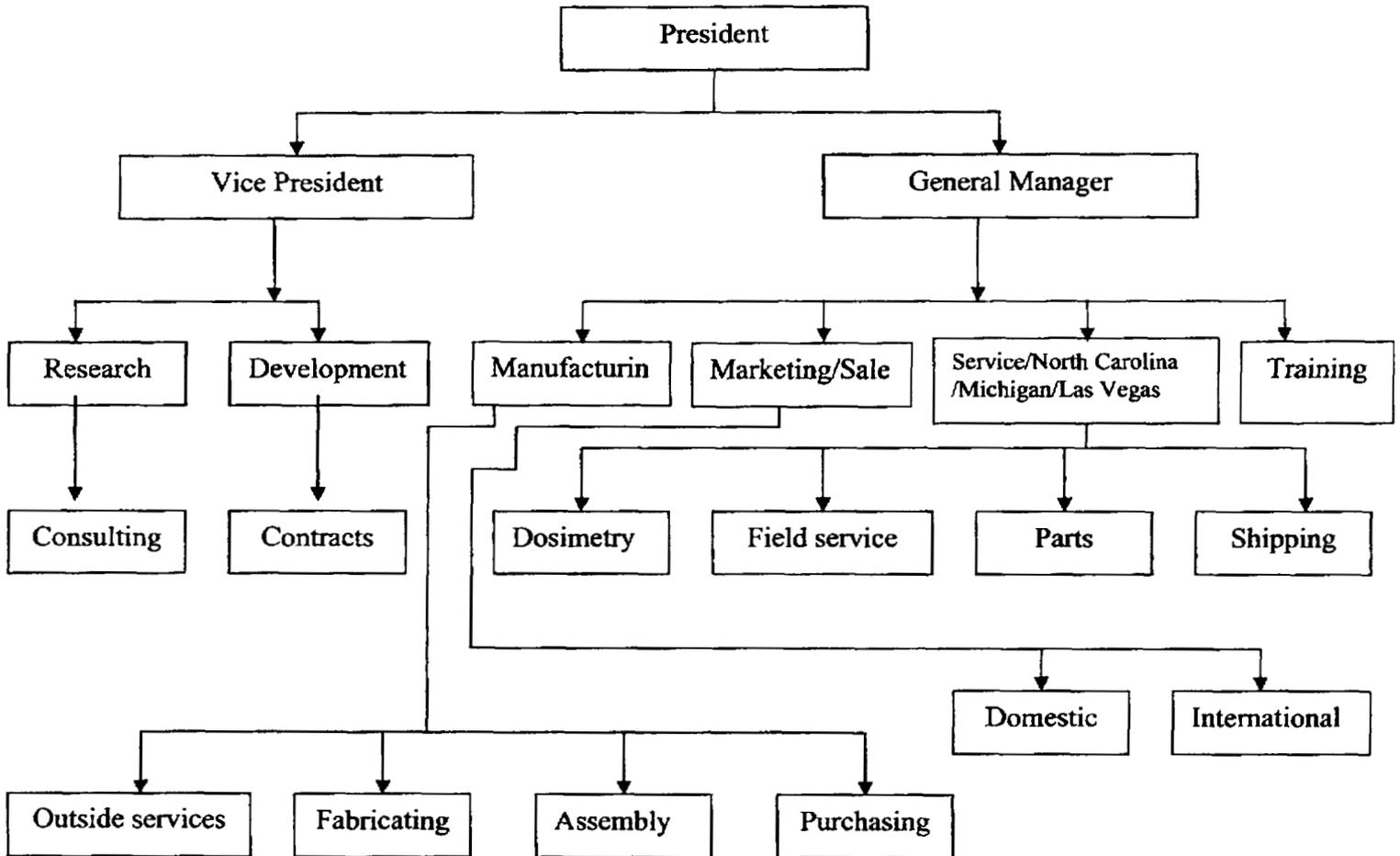


Ali Regimand
President



InstroTek[®]
Inc.

InstroTek, Inc. Organizational Chart



InstroTek Training Program for Safe Removal of Source Rods from Nuclear Moisture Density Gauges

Introduction:

All new employees hired to work in the service department at InstroTek shall follow the requirements below for safe removal of Cs-137 source rods from nuclear moisture density gauges. Source rod removal training is hands on with actual gauges, supervised and demonstrated by at least one of the instructors listed below.

- 1- Regardless of the experience and education level, all new service employees will be trained for a minimum of one week at InstroTek, Inc. in our headquarters in Raleigh, NC.
- 2- After the first week period, each new employee will work under the supervision of a senior technician for a minimum of two weeks.
- 3- Before they are allowed to remove source rods without supervision, they are required to remove source rods from a minimum of 20 gauges, while supervised by a senior technician and at least one of the trainers listed below.
- 4- All training and training supervision is conducted by the instructors listed below.

Requirements:

- 1- At minimum an Associates degree or previous experience in mechanical, industrial or electronic maintenance and repair.
- 2- Completion of a minimum of eight hours of an approved Radiation Safety training course. The employee is required to score 90% or better on the Radiation Training and CFR49 Training Exam. Our passing requirement is 20 % higher than requirements of NRC.
- 3- Familiarity with the Radiation Safety and other Safety procedures of the company.

Procedures:

- 1- After checking the gauge into the incoming log according to the requirements of the materials license, the gauge is placed in the shielded holding bay for inspection and repair.
- 2- The gauge is removed from the bay and placed on a technicians bench
- 3- Remove the top cap from the index rod
- 4- The source rod is removed from the gauge and kept at arms length and immediately placed inside a lead pig, with minimum of 2 inches of lead surrounding the Cs-137 source. The lead pig is placed a minimum of 4 feet from the area where gauge is being serviced.
- 5- The source rod will remain in the pig until all repair and routine maintenance steps have been completed.
- 6- Source rod is removed from the pig and replaced back in the gauge, ensuring that it is kept at arms length while outside the gauge.
- 7- The source rod is secured in the gauge according to the manufacturer's recommendations.

Note: Am-241: Be source will never be removed from the gauge by the service technicians.

Trainers and Instructors:

The following trainers are directly involved with training and supervision of all service employees.

Ali Regimand- MS degree in Nuclear Engineering, N.C. State University, with twenty plus years of experience in research, development, design, training and manufacturing of radioisotope based products.

Lawrence James: Ph.D. degree in Nuclear Physic, N.C. State University, with over 15 years of experience in research, development, design, training and manufacturing of radioisotope based products.

Johnny Williams: Technical degree in electronics with 20 plus years of experience in service and calibration of nuclear moisture/density gauges. Johnny was a lead service technician at Troxler Electronics for over 16 years.

Emil Albouyeh: Technician with 9 years of experience in repair, calibration and trouble shooting of nuclear moisture/density gauges. Emil has served as a lead technician dealing with nuclear gauge repair and service at InstroTek for the last 10 years.

Rev 1, 2006

Service Personnel Training Checklist

Employee Name: _____ Job Title _____ Date of Hire _____

Radiation Safety Training:

- Gauge Operator Training
Date: _____
- Company emergency response procedures
- Radiation safety steps and procedures related to removal of source rod

Additional Training

Type: _____

Service Training:

- Gauge check in procedure
- Gauge radiation screening procedure
- Use of the leak test machine
- Removal of source rod
- Shielding and storage of source rod
- Cleaning and greasing of the source rod and bearings
- Source rod, index rod and sliding block visual inspection
- Source rod weld digital camera inspection and reporting
- Electronics troubleshooting and repair
- Review of gauge components and functionality
- Review of schematics and related gauge repair documents
- Component level repair
- Board level repair

Document Creation:

- Create Quotes
- Create Sales Orders
- Create Packing List
- Create shipping documents
- Create Invoice

Calibration Training:

- InstroTek 3500 gauge three block calibration
- Troxler model 3401, 3411, 3430, 3440 gauge, three block calibration
- Troxler model 3401, 3411, 3430, 3440 gauge, five block calibration
- Troxler model 4640
- Troxler model 3450
- Humboldt 5000 series gauges
- CPN MC series gauge
- Use of the calibration programs
- Burning gauge calibration PROMs
- ValiDator Training
- Verifier Training
- QC method and procedures for different model gauges

Shipping:

- Packaging of gauges prior to shipment
- Packaging of parts prior to shipment
- Shipping gauges using Fed X
- Shipping gauges using truck carriers
- Shipping parts using UPS and Fed X
- International shipments

Employee Signature _____

Supervisor Signature _____

Manager Signature _____

Date: _____

New Employee Safety Training Checklist

InstroTek, Inc.

Employee Name: _____

Start Date: _____

Position: _____

Nuclear Gauge operator and safety Training Date _____

Review of Company Emergency Procedures ____ (Yes) ____ (No)

Review of other safety requirements ____ (Yes) ____ (No)

Employee Section:

1- Do you feel you are sufficiently trained to safely operate nuclear instrumentation under the requirements of InstroTek's license
____ (Yes) ____ (No).

2- Do you understand that you maybe required to undergo additional safety training, if deemed necessary by your immediate supervisor and company RSO
____ (Yes) ____ (No)

Comments: _____

Employee Signature: _____

RSO Authorization: _____