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November 6, 2007

Mr. James Montgomery  
United States Nuclear Regulatory Commission  
Nuclear Materials Licensing Branch  
611 Ryan Plaza, Suite 400  
Arlington, TX 76011-4005

Reference: Idaho Radioactive Materials License No. 11-22727-01  
Reference: My letter of August 18, 2007

Dear Mr. Montgomery:

Per our telephone conversation on November 1, 2007, the gauge disposal will proceed as follows:

1. In order to limit potential contamination, the work area will be laid out with absorbent blotter paper.
2. Temporary shields will be erected using lead bricks, so that a proper radiation safety barrier can be between the gauge under disassembly and the worker.
3. A digital camera will be set on a tripod to photograph each individual source, once it is removed from the gauge, to record all identification on the source.
4. Leak test wipes can be performed from behind the lead shield, as appropriate.
5. Sources will be moved utilizing long tongs into an appropriate lead shipping cask.
6. Gamma ionization meters will be used to determine the radiation dose rate, and full dosimetry, including finger rings will be worn to permanently record all personnel radiation exposures.
7. A portable survey meter will be used to verify no surface contamination on the empty gauge head / source holder.
8. Proper procedures and safety precautions will ensure all radiation exposure is kept within ALARA concepts.

Thank you for your prompt attention to this matter.

Sincerely,

James F. Miller, R.S.O.