



2130 GARY COURT • DECATUR, ILLINOIS 62526 • 217/425-6244

January 2, 2009

ATTN: Document Control Desk  
Director, Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Sir,

ICAL, INC. has a need for limited use of its 20WC-5 overpacks in the foreseeable future. Some specific information about the ICAL license that provides insight into statements made in the "Requested Information" submittal below – ICAL's license is the only one issued by the USNRC (to the best of my knowledge) that is strictly for a mobile calibration facility. As such, ICAL relocates its mobile units containing at least one Type B source (requiring an overpack per DOT shipping regulations) to a customer premises upon obtaining a contract to perform calibration services. It should also be noted that the ICAL license and the Calibration units are under the Increased Controls Program requirements.

ICAL, INC. submits the following information in accordance with guidance provided in RIS 2008-18:

1. Package Information: DOT Specification Number 20WC-5
2. Identification of Shipments: (a) A minimum of one shipment to return one Mobile Calibration Facility unit to Decatur, IL from Knoxville, TN at such time that the current lease contract is not renewed. Other shipments are possible if new customers are obtained before a suitable replacement shipping container is available. (b) One package per shipment (c) ICAL 1 and/or ICAL 2 are the 20WC-5 identifying numbers (d) One Model 89 Shielded calibrator source assembly (e) Reassembly on the Model 89 for dose rate instrument calibration (f) one shipment would be Knoxville, TN to Decatur, IL. Additional shipments are indeterminate at this time. (g) ICAL, INC. 40 foot Mobile Calibration Facility (semi-trailer) towed by licensed, contacted hauler such as Tri-State, Hittman or Kindrick. (h) Timeframe is indeterminate presently. (i) Timeframe is indeterminate at this time but will occur upon successful replacement of the 20WC-5 containers
3. Reason for Requesting Extended Use: There is no suitable replacement container fabricated and licensed for use at the present time (or in the foreseeable future)

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designed to contain the Model 89 Shielded Calibrator source assembly. The Model 89 Calibrator source assembly can not be disassembled or the source safely and easily removed to allow repackaging in another container for shipment.

ICAL, INC. has been in contact with J.L. Shepherd and Associates (the Model 89 Calibrator manufacturer), Hopewell Industries (another source /calibrator manufacturer) and with Alpha-Omega Products (who advertised in nuclear trade magazines that they were working on replacement containers). Alpha-Omega informed ICAL that it had no plans to manufacture a container that would accommodate the Model 89 shield and if it did, the purchase cost would be in the six figure range which is well beyond ICAL's financial capability. Shepherd informed ICAL that it has obtained an extension to continue using its 20WC series containers. At this time, ICAL can only wait and see how J.L. Shepherd addresses this issue since they are in an identical situation with source transportation.

Since one mobile calibration facility unit is in Knoxville, TN, it must be removed and returned to either Decatur, IL or another temporary job site within Tennessee at such time that the customer decides to terminate the lease. Failure to do so could result in Tennessee license violation and or Increased Controls Program non compliance.

4. Safety Justification for Continued Use and Proposed Compensatory Measures: Safety considerations of the 20WC-5 containers has never been an issue for over 30 years of its permitted use, thus discontinuing its use appears to be a matter of conformance to international standards merely to "harmonize" rather than as a resolution to any technical or safety issues.

Compensatory measures that ICAL will employ are the same as those that have been used since going into business – the 20WC-5 containers are owned, stay with a particular mobile calibration facility unit and are well maintained and infrequently used, they are subject to pre and post source loading inspections for integrity and physical condition per ICAL, INC. procedures, all shipments are exclusive use since it is the individual mobile calibration unit that is the transport vehicle.

5. A Plan and Schedule to Acquire Replacement Packages or Complete Necessary Shipments: Acquiring a replacement package is not practical since none exists at this time or is anticipated to exist in the foreseeable future based upon current industry information. Cost for package purchase or lease should one become available will determine ICAL's course of action at that time.

Should you have any questions or need additional information you may contact me via telephone at (217) 425 6244 or via E-mail at [ICALINC@aol.com](mailto:ICALINC@aol.com).

Sincerely,



Robert Harris  
President