

Baker, Stephen

From: Fuller, Mike [Mike.Fuller@qsa-global.com]
Sent: Monday, April 13, 2009 1:52 PM
To: Stephen Baker
Subject: FW: 10CFR110.50(B)(4) Notification

Dear Stephen,

Below is a sanitized reiteration of my response originally submitted to you on 5 November 2008.

In response to your request for clarification as to how we authorized the 28 October 2008 shipment to Australia, I have reviewed the correspondence in regard to this shipment, the hard copy of the order, the shipping paperwork, and the customer file and can find nothing that would justify the release of these sources that clearly exceed the customer's license limit. Given a general acceptance of 20% overage for Ir-192 sources, the maximum activity of each source should have been limited to 1.44 TBq, not 1.78 TBq.

Note that the shipping documents state that the source activities on 10/28/2008 were 1.707 TBq and 1.665 TBq (below the limit I'd set, but above the licensee's limit).

I've been in contact with the Australian regulators to determine whether they will allow the customer to receive these sources to hold for decay, or whether we will need to have them returned. As of yesterday afternoon, the sources were in Sydney (in Customs, I believe). Their only response so far was to request specific information with regard to source serial numbers and destination. I'll keep you informed of the progress.

In regard to your concern, though, there is an error I believe in interpretation (yours or mine is yet to be determined). The license for this Australian customer (and other clients in Western Australia) places a per-source limit of 1.2 TBq for each radiography camera (model 880, model 660) in which the source is installed. The sources were not shipped in radiography cameras, but a source changer (specifically, a model SC-3746B). I've reviewed the other Western Australia licenses we have on file and, like Canada and other countries, source changers are not specifically addressed or itemized. Given that the licensee lists 3 of our radiography cameras on their license I would contend that we could ship 3 sources to them in a source changer and still be in compliance with their license, as long as the activity of each source subsequently installed in a radiography camera did not exceed 1.2 TBq.

Please let me know whether this interpretation is accurate, and as I said earlier I will keep you abreast of our progress on the 2 sources in question.

Best regards,

Michael Fuller

Regulatory Compliance Associate
QSA Global, Inc.

781-272-2000 x231 <> www.qsa-global.com

From: Stephen Baker [mailto:Stephen.Baker@nrc.gov]
Sent: Tuesday, November 04, 2008 2:19 PM
To: Fuller, Mike
Cc: Stephen Dembek; Nicole McClain
Subject: FW: 10CFR110.50(B)(4) Notification

Mike:

According to Section 3.3 of the Western Australian government's material possession license that accompanied the attached notification, the regulator specified that the maximum activity in any radiography source container shall not exceed 1,200 GBq or 1.2 TBq source of Iridium-192. QSA shipped two sources totaling 3.56 TBq, an overage of ~196.7% $((3.56/1.20) - 1 = 196.67)$. Even if they were shipped separately, this would still be 48% above what the regulator authorized.

A 20 percent overage for Iridium-192 traveling to Australia is acceptable, however, levels approaching these are not. In light of this, please provide us with an explanation or additional documentation that supports this export.

Stephen Baker
U.S. Nuclear Regulatory Commission
Office of International Programs
(301) 415-3329

From: HOO Hoc [mailto:HOO.Hoc@nrc.gov]
Sent: Monday, October 27, 2008 12:31 PM
To: Stephen Baker; Stephen Dembek; HOO Hoc; Brian Horn; Nicole McClain
Subject: FW: 10CFR110.50(B)(4) Notification

From: Fuller, Mike[SMTP:MIKE.FULLER@QSA-GLOBAL.COM]
Sent: Monday, October 27, 2008 12:32:04 PM
To: HOO Hoc; Traegde, Kenath (DPH)
Cc: EXPORT
Subject: 10CFR110.50(B)(4) Notification
Auto forwarded by a Rule

Please note the following notification scheduled to ship 28 October 2008:

Australia
[QSA Customer] – (2) Ir-192 sources, approx 1.78 TBq each

Regards,

Michael Fuller
Regulatory Compliance Associate
QSA Global, Inc.
Mike.Fuller@QSA-Global.com
(781) 505-8231

This transmission contains information which may be confidential and which may also be privileged. It is intended for the named addressee only. Unless you are the named addressee, or authorized to receive it on behalf of the addressee you may not copy or use it, or disclose it

to anyone else. If you have received this transmission in error please
contact the sender. Thank you for your cooperation.

For more information about QSA Global Inc.
please visit our website at <http://www.qsa-global.com>

This transmission contains information which may be confidential and
which may also be privileged. It is intended for the named addressee
only. Unless you are the named addressee, or authorized to receive it
on behalf of the addressee you may not copy or use it, or disclose it
to anyone else. If you have received this transmission in error please
contact the sender. Thank you for your cooperation.

For more information about QSA Global Inc.
please visit our website at <http://www.qsa-global.com>