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February 9, 2010

Security and Industrial Branch
Division of Nuclear Materials Safety
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415
Attn: Ms. Laurie Kauffman
Tel: 610-337-5323
Fax: 610-337-5269
Email: laurie.kauffman@nrc.gov



Subject: Mail Control # 144334, License No. 44-30912-01

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Ms. Koffman:

In response to your email of February 5, 2010, R.O.V. is pleased to provide the following response. For clarity and our mutual convenience, your questions are reiterated in ***bold italics***.

1.) Regarding Item 6.B of your license, I asked if you would require Ra-226 on your license. You stated that you would be able to provide this information today February 5, 2010, or by early next week (February 10, 2010). If you require Ra-225, please provide chemical and/or physical form and the quantity, including maximum amounts.

We trust that the reference to Ra-225 is intended to refer to Ra-226 as in the first sentence. While Ra-226 is typically only present due its existence in the Uranium decay chain, R.O.V would like to retain authorization to possess Ra-226. Commensurate with the recent change to the definition of *byproduct* material, we believe that Ra-226 (as well as other Radium isotopes) has been and continues to be authorized by license condition items 6, 7, and 8, line B; which continues to be accurate. No changes to these license conditions are requested.

2.) Regarding Authorized Use - Item 9.C of your license, I asked if you calibrate licensee's instruments. You stated that you had planned to conduct DOP testing for licensees but, you currently do not and that you send instruments to a calibration facility to be calibrated. You stated that you would like to keep this Authorized Use on the license, in the event that you obtain a contract to conduct DOP testing or other services for other licensees.

R.O.V. does not intend to calibrate other licensee's radiation detection instruments. R.O.V. does not believe that specific authorization on the license is necessary to conduct DOP testing as a service for other licensees as the only licensing requirement is related to the contamination that may or may not be present on the equipment. Accordingly, we view DOP testing to be encompassed by the existing authorizations on the license. No change to License Condition 9 is requested. Please advise us if our views in this regard are incorrect.

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3.) Regarding License Condition 12.G., I asked you, who analyzes leak tests? Do you have equipment to do it?

While R.O.V. may have equipment to conduct some leak tests, we do not plan to perform leak testing on our own sources or as a service to others. Currently, R.O.V. does not currently possess any source that requires leak testing in accordance with License Condition 12. Notwithstanding, leak tests, when required by the license, will be performed at intervals approved by NRC or an Agreement State and specified in the Sealed Source and Device Registration Sheet. Leak tests will be performed by an organization authorized by NRC or an Agreement State to provide such services to other licensees or using a leak test kit supplied by an organization authorized by NRC or an Agreement State to provide leak test kits to other licensees and according to the kit supplier's instructions.

Early review and revision of our Decommissioning Cost Estimate (DCE) is a significant burden. R.O.V. is aware, and has committed to review its DCE in accordance with 10 CFR 30.35(e). That commitment is specified in the DCE dated October 3, 2005 and incorporated into the license by reference in License Condition 17.H. R.O.V hereby reaffirms its commitment in that regard and shall submit its review and potential update in a timely manner.

Should you have any further questions or require addition information, do not hesitate to contact Jack Judge at Area Code 802 Telephone 254-9353.

Very Truly Yours,

John J. Judge, Jr.
R.O.V. Technologies, Inc.

cc: Thomas J. Dente, RSO