

# **Servicing & User Instructions**

# Types of Services

- Installation
  - mounting
  - relocation
  - commissioning the device - e.g., unlock, inspect.
- Routine Maintenance/Testing
  - on/off mechanisms
  - on/off indicators
  - source exchanges
  - calibration
  - leak testing
  - labels
  - radiation survey
  - training
  - mechanical inspections
  - e.g. belts, lubrication.

## Types of Services (cont.)

- Non-Routine Maintenance/Repair
- Decommissioning
  - dismantling
  - packaging
  - transporting
- Damage/Emergency Response
- Specialty Procedures
  - conditions for storage
  - use life exceeded.

# Evaluation and Instructions to Users

- Instructions to Users - Adequate for Performing above Listed Operations?
- Who can Perform - Do and Don't List
  - reference 10 CFR 32.51(c) for general licensees performing servicing.
- Will Vendor Provide Services? If Not, Who Will?
  - specifically addressed when transferring a certificate to inactive status
- What If No One Will Provide Servicing

# Evaluation and Instructions to Users (cont.)

- Doses During Performance of Services – Is Special Training Needed
- Impact on Device Integrity
- Other Instructions to Users – copies of regulations, special regulatory instructions, transportation regulations, listing of NRC Regions and Agreement States.

# Evaluation and Instructions to Users (cont.)

The Reviewer Needs to Verify That the Documentation Provided to Users of the Products Does Not Misinterpret, Misrepresent, or Lead the User into Violating Any Applicable Regulations

# Leak Testing

- Not Required for Exempt Products, Krypton, Tritium,  $\leq 100 \mu\text{Ci}$  gamma/beta, or  $\leq 10 \mu\text{Ci}$  alpha.
- for All Others, Typically 6 Month Intervals.
- Can Approve up to 36 Month Intervals.  
Use 10 CFR 32.51(b) for Evaluation Criteria.
- Review Procedures, Doses, and Necessary Instructions/Training.

# Mounting of Source Housings

- Reference NUREG-1556, Vol. 4 - Fixed Gauges
- Untrained individuals (i.e., general licensees and specific licensees without specific authorization under their license) may be permitted to *mount* source housings.
  - source housing shutter mechanism is locked
  - likely doses to persons mounting the device
  - why specific training is not necessary
  - written procedures



# Mounting of Source Housings (cont.)

- Written Procedures:
  - product must be mounted in an appropriate location.
  - on-off mechanism must be locked in the off position, or the source is sufficiently shielded
  - no damage to source housing/package
  - product must not require any modification to be mounted.
- An authorized individual must commission the source housing - inspect and remove the lock.
- Include in the "Limitations and/or Other Considerations of Use" section of the registration certificate the provisions for mounting of the source housing.

# Transferring Certificates to Inactive Status

- What services will the vendor continue to provide. For services that they will not provide, are they aware of an entity that will provide services.
- Reviewers should recognize that vendors or service companies may discontinue providing services. The NRC is typically notified when a vendor decides to no longer provide services.
- Registration certificate holders requesting to transfer a registration certificate to inactive status should identify whether they plan to continue to provide services for the registered products or whether someone else will provide services.