



April 18, 2011

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

**Reference: Reply to a Notice of Violation – Docket No. 03034162, License No. 29-30308-01**

In response to the findings of NRC Inspection No. 03034162/2011001 for Sterigenics International, Inc., which was conducted at the Rockaway, NJ facility on March 1, 2011, the following describes the corrective and preventive actions being taken to address the violation noted during the inspection. The Severity Level IV violation cited was *"On or about April 1, 2008, October 29, 2008, and August 5, 2009, Sterigenics International, Inc. an NRC Licensee pursuant to Part 30, delivered for transport licensed material in violation of its general license because Sterigenics International, Inc. did not comply with DOT Certificate USA/6306/B(U) and USA/0617/B(U)-96. Specifically, Sterigenics International, Inc. did not comply with the conditions of the MDS Nordion F-168 certificate as endorsed by the DOT revalidation."*

As discussed during the inspection, the corrective and preventive action for the cited violation is that Sterigenics will discontinue the internal program for shipping radioactive sources from our facilities. Instead, for any sources being returned to the manufacturer or any other authorized recipient, Sterigenics will contract to an authorized party to offer the package for shipment, including preparing the package and signing the applicable documentation as the shipper of the package. For the foreseeable future, the source supplier, either Nordion or Reviss, will be the contracted party for each shipment, depending on the destination of the sources.

We feel that these organizations are better equipped to remain current with the requirements and procedures than is Sterigenics, as outbound source shipments do not occur frequently within our organization. To that end, I have confirmed the contract arrangements with Nordion for the next source shipments to occur from a Sterigenics facility.

I trust that, since we will no longer be performing these functions, that the corrective action would be considered adequate to prevent recurrence. Should you need any further information or clarification, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark A. Smith'.

Mark A. Smith, Ph.D., CHP  
Vice-President, Radiation Services

cc: NRC, Regional Administrator - Region I

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