



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

August 5, 2011

EA-09-238

Steve Twilley, Director
North America
Roxar Flow Measurement, Inc.
3300 Walnut Bend Lane
Houston, Texas 77042

SUBJECT: NRC INSPECTION REPORT 030-36402/09-001 AND INVESTIGATION
REPORT NO. 4-2009-057F

Dear Mr. Twilley:

This refers to the inspection activities conducted from February 2, 2009, through July 15, 2011. This inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations, and with the conditions of your NRC license. Within these areas, the inspection consisted of onsite reviews at your Houston, Texas, office, selected examination of procedures and representative records, observations of activities, and interviews with your personnel and selected customers. In addition, the NRC's Office of Investigations conducted an investigation into the matters discussed in the enclosed report. After in-office reviews of all the information collected, a final telephonic exit briefing was conducted with you and members of your staff on July 15, 2011. The enclosed report presents the results of this inspection (Enclosure 1).

Based on the results of this inspection one apparent violation was identified and is being considered for escalated enforcement action in accordance with the NRC Enforcement Policy in effect at the time the apparent violation occurred (ADAMS ML092440278). The apparent violation involved the transfer of radioactive material for use in fixed gauges to entities that did not possess a specific or general NRC radioactive materials license or an Agreement State radioactive materials license that authorized them to receive and use the material.

Before the NRC makes its enforcement decision, we would like to discuss the issue at a predecisional enforcement conference. Please contact Mr. Michael Vasquez of my staff at (817) 860-8130 within 7 days from the date of this letter to schedule a predecisional enforcement conference. A proposed agenda for the conference is enclosed (Enclosure 2). This conference will be open to public observation in accordance with Section 2.4 of the NRC Enforcement Policy, and a meeting notice may be issued to announce the conference.

The decision to hold a predecisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information to assist the NRC in making an enforcement decision. This may include information to determine whether a violation occurred, information to determine the significance of a violation, information related to the identification of a violation,

and information related to any corrective actions taken or planned to be taken. The conference will provide an opportunity for you to provide your perspective on these matters and any other information that you believe the NRC should take into consideration in making an enforcement decision. In presenting your corrective actions, you should be aware that the promptness and comprehensiveness of your actions will be considered in assessing any civil penalty for the apparent violation. The guidance in the enclosed NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action" (Enclosure 3), may be helpful.

At the conference, you should be prepared to present your corrective action plan to restore compliance regarding the fixed gauges transferred to users for subsea Gulf of Mexico use. Those users appear to be in possession of radioactive material without a general or specific license. Also, please be prepared to discuss the statements from the quotations and purchase documents discussed in Section 2.3 in the enclosed report. We request that you have copies of the quotations and purchase documents available for review. In addition to discussion of the past transfers, please be prepared to present to us at the conference your current policies and procedures regarding commercial distribution of generally licensed Roxar gauges and specifically licensed Tracerco gauges.

The NRC requests that, within 14 days of the date of this letter, you provide the following information: Company name, address, and contact information for the companies to which the radioactive material was transferred, and the exact dates on which the transfers took place. The information provided by Roxar's Radiation Safety Officer in 2009 included contact information for the end users, which was not necessarily the same as contact information for the companies to which the radioactive material was originally transferred.

If you believe all, or a portion, of your response to the requested information should be withheld from public disclosure because it contains trade secrets, privileged, or confidential commercial or financial information, please follow the procedures under 10 CFR 2.390 when submitting your response to the requested information or when preparing materials to be presented at the predecisional enforcement conference.

Since the NRC has not made a final determination in this matter, a Notice of Violation is not being issued for these inspection findings at this time. In addition, please be advised that the number and characterization of apparent violation described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations after the predecisional enforcement conference.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response to the requested information, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's

Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

Roy J. Caniano, Director
Division of Nuclear Materials Safety

Docket: 030-36402
License: 42-27765-01

Enclosures: As stated

cc w/Enclosures 1 and 2:
Richard A. Ratliff, P.E., L.M.P., Chief
Radiation Safety Licensing Branch Manager
Division for Regulatory Services
TX Dept. of State Health Services
P.O. Box 149347 - Mail Code 2835
Austin, TX 78714-9347

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R: DNMS

ADAMS	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	XSUNSI Review Complete		Reviewer Initials: JMR
<input checked="" type="checkbox"/> Publicly Available		<input type="checkbox"/> Non-publicly Available		<input type="checkbox"/> Sensitive	<input checked="" type="checkbox"/> Non-sensitive
Category – KEYWORD:			n/a		
DNMS:NMSB-A	DNMS:NMSB-A	C:NMSB-A	ACES		
MPoston	JMRazo	GMVasquez	MCMaier		
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RJCaniano					
/RA/					
08/05/11					

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U.S. Nuclear Regulatory Commission
Region IV

Docket: 030-36402
License: 42-27765-01
Report: 030-36402/09-001
EA: EA-09-238
Licensee: Roxar Flow Measurement, Inc.
Facilities: Main Office
Location: Houston, Texas
Dates: February 2, 2009, through July 15, 2011
Inspector: Jason Razo, Health Physicist
Nuclear Materials Safety Branch A
Approved By: G. Michael Vasquez, Chief
Nuclear Materials Safety Branch A
Attachment 1: Supplemental Inspection Information
Attachment 2: License and Device History

EXECUTIVE SUMMARY

Roxar Flow Measurement, Inc.
NRC Inspection Report 030-36402/09-001

This was an inspection of licensed activities conducted by Roxar Flow Measurement, Inc. (Roxar) at its office in Houston, Texas. The first onsite inspection was conducted on February 2, 2009, and after in-office reviews of information provided by the licensee, a follow-up onsite visit was conducted on August 4, 2009. The NRC's Office of Investigations also conducted an investigation into Roxar's activities. In addition, interviews were conducted in 2010 with customers of Roxar. This report describes the findings of the inspections.

Program Overview

Roxar is licensed by the NRC to possess and use radioactive material in two types of fixed gauges at the licensee's facilities located at temporary job sites anywhere in NRC jurisdiction. One gauge is designed for subsea fixed flow measurement, and the second gauge is designed for land-based use. (Section 1)

Inspection Findings Considered for Escalated Enforcement

One apparent violation of 10 CFR 30.41(a) and (b)(5) was identified regarding Roxar's apparent transfer of radioactive material to its customers, who did not have a specific or general license that authorized them to receive, possess, and use radioactive material. (Section 3)

Corrective Actions

In January 2009, Roxar became authorized to commercially distribute the Roxar gauges as generally-licensed, and Roxar ensured that customers followed the correct procedure for registering as a general licensee. (Section 4)

Roxar also developed procedures to ensure that before transferring radioactive material to specific licensees, Roxar verified that the customers possessed a specific radioactive materials license. (Section 4)

Report Details

1 Program Overview (87124)

1.1 Inspection Scope

This was a routine, unannounced inspection of licensed activities authorized under Roxar's NRC license beginning on February 2, 2009. After the onsite inspection, the inspector gathered additional information from the licensee's radiation safety officer (RSO). The inspector conducted a second onsite visit on August 4, 2009, with assistance from an investigator from the NRC Office of Investigations. The inspector and investigator conducted additional interviews at various times during calendar year 2010 with customers of Roxar.

The NRC issued byproduct materials license 42-27765-01 to Roxar in September 2003, which authorized Roxar to possess and use two different types of fixed gauges, a Roxar gauge and an ICI Tracerco gauge, only at the licensee's facilities located at temporary job sites anywhere in NRC jurisdiction. Amendment No. 2 of NRC byproduct materials license 42-27765-01 was issued to Roxar on May 12, 2008. The Roxar gauge is a multiphase meter designed for subsea fixed flow measurement. The Tracerco gauge is designed for land-based use. Prior to the issuance of the NRC license, beginning in March 2003, Roxar operated in NRC jurisdiction under the general license pursuant to 10 CFR 150.20 (reciprocity) using its Texas Agreement State license (Texas Department of State Health Services Radioactive Material License L05547).

1.2 Observations and Findings

Roxar is an international company with main offices in Norway that provides products and services for reservoir management and production optimization to the oil and gas industry. Domestic operations are based in Houston, Texas. In Houston, the RSO is part of the After Sales Team, and reports to the After Sales Manager. The After Sales Manager reports to the Vice President of Sales and Marketing based in Norway. The After Sales Team is responsible for providing customer support services after products have been sold by the sales team. Those products include fixed gauges with sealed sources containing 30 millicuries of cesium-137. Roxar's customers use the gauges to quantify fluid flow through various piping systems. Roxar had placed a Tracerco gauge at a customer's site in Alaska and Roxar gauges at customers' sites below offshore platforms located in Federal waters in the Gulf of Mexico.

1.3 Inspection History

In July 2003, the NRC inspected a Tracerco gauge at Roxar's temporary job site in Kuparuk, Alaska. No violations were identified at that time, and the inspector verified that Roxar was meeting the requirements of its general license under 10 CFR 150.20. Those requirements included adequate training for the gauge user and an evaluation of the safety and security of the gauge.

In September 2003, Roxar received an NRC license. In February 2004, the NRC conducted an initial inspection at Roxar's office in Houston, Texas. No violations were identified. At the time of the inspection, Roxar had two gauges in use in NRC jurisdiction. The gauges were at the same locations as listed in the 2003 reciprocity

requests; a Tracerco gauge was onshore in Kuparuk, Alaska, and a Roxar gauge was subsea in Federal waters in the Gulf of Mexico. No other inspections had been conducted prior to February 2009.

2 Inspection Findings (87124)

2.1 Inspection Scope

On February 2, 2009, the inspector conducted an onsite inspection at Roxar's Houston, Texas, office. The inspection consisted of a selected examination of procedures and representative records and interviews with personnel. At that time, the RSO maintained a spreadsheet inventory listing 29 gauges that Roxar had sold and transferred for use in NRC jurisdiction. The inventory for NRC jurisdiction included 28 Roxar gauges subsea in the Gulf of Mexico and a single Tracerco gauge onshore in Alaska.

On August 4, 2009, the NRC conducted a second onsite inspection. This inspection included assistance from an investigator from the NRC Office of Investigations. This second inspection included interviews with key staff and a review of pertinent documents related to the transfers. The personnel interviewed included the RSO, the After Sales Manager, the Topside Sales Manager, and the Subsea Sales Manager.

2.2 Tracerco Gauge

For the Tracerco gauge installed in Alaska, Roxar arranged for, and performed, the required sealed source leak test at the 36-month interval. However, this Tracerco gauge required a shutter test at 6-month intervals. There was no documentation available that indicated that the shutter tests had been performed since installation and commissioning of the gauge in 2003. At the time of the inspection, Roxar representatives indicated that they relied on customer oversight for the proper operation of the Tracerco gauge.

In contrast to the situation during the NRC's 2004 inspection, in 2009, Roxar no longer had a proactive day-to-day involvement in the operation of the Tracerco gauge. Roxar no longer had a direct physical presence in Alaska or real-time remote monitoring capability. As a result, it appears that Roxar had transferred the radioactive material to its customer.

10 CFR 30.41(a) and (b)(5) require, in part, that no licensee transfer byproduct material except to an entity authorized to receive such byproduct material under the terms of a specific license or general license issued by the Commission or an Agreement State.

In 2003, Roxar appears to have transferred specifically licensed Tracerco gauge containing radioactive material to a company not authorized to receive such byproduct material under the terms of a specific license or general license issued by the Commission or Agreement State. This was identified as an apparent violation of 10 CFR 30.41(a) and (b)(5). (030-36402/09-001-01)

2.3 Roxar Gauges

In June 2009, the NRC requested more information about the subsea Roxar gauges. The items requested included details on the locations and users of the subsea Roxar gauges. The NRC requested this information to verify that the Roxar gauges were

installed in NRC jurisdiction in the Gulf of Mexico. In addition, Roxar verified that the Roxar gauges were all sold to the customers; none were leased or under a separate agreement.

When interviewed, members of Roxar's sales staff stated that their job was to match customers' needs to a specific meter; in some cases, the Roxar gauge with a radioactive sealed source was optimal for a customer's application. If the Roxar gauges with radioactive material were required, Roxar would then issue a quotation to the customer. The quotation listed the items, proposed prices of the purchase, and the conditions for the sale. One of the items listed was the "Gamma Densitometer," which referred to the Roxar gauge containing the radioactive source.

During a review of quotations and purchase documents dated from 2003 through 2008, for five different customers, the inspector identified statements referring to the gamma source. In all cases, the documents written by Roxar stated, in part, that the "customer must have a license for the radioactive material in order to be in compliance with regulations." The documents also included this statement: "Roxar would assist the customer in the process of obtaining the required license." These documents described the procedure necessary to possess and use this type of material at the time these documents were written. These conditions were included in the final purchase orders signed by Roxar's customers.

The current RSO and sales staff could not confirm whether these licensing items were discussed with the customers at the time of sale since these individuals were not in their current positions at that time. The previous Roxar RSO (the RSO at the time of the sales) is no longer employed by Roxar and was not available for interview. In contrast to the purchase documents, Roxar did not assist its customers in obtaining licenses authorizing the possession and use of the radioactive materials. In fact, during the inspection, Roxar's position was that it had not transferred the radioactive material to its customers; and that the radioactive material was being possessed and used under Roxar's license.

In 2010, the NRC interviewed multiple customers of Roxar that had purchased and were using Roxar gauges at subsea locations in Federal waters in the Gulf of Mexico. The interviewees included managers, regulatory compliance staff, operators, attorneys, and RSOs. The inspector and investigator reviewed quotation documents, purchase orders, and operating instructions associated with the acquisitions of the Roxar gauges. Despite the wording of the quotations and purchase documents, the customers appeared not to understand that they required a specific license from the NRC in order to possess and use the Roxar gauges.

An initial version of a procurement document showed that Roxar put a line item in a contract that charged a fee for "Nuclear Regulatory Commission License for 10 years." The customer stated that he was able to negotiate this fee, and the final document in the purchase agreement said, "Nuclear Regulatory Commission License for 10 years, included."

Other statements from contract-related documents included:

- "Note that in accordance with regulations the source owner must have the license. Roxar will assist in this process."

- “The Customers of Roxar are responsible for the radioactive source as soon as it is in his possession.”
- “Note: For Roxar meter delivered outside Norwegian borders, customer is responsible for having procedure covering the local countries [sic] regulations regarding safety and handling of radioactive sources.”

The NRC’s interviews with Roxar’s customers indicated that the customers thought they were just purchasing a Roxar gauge, and that Roxar would handle the regulatory requirements associated with the radioactive material.

3 Inspection Findings Considered for Escalated Enforcement

NRC license 42-27765-01 issued to Roxar in 2003, stated, in part, that the byproduct material within the gauges may be used only at Roxar’s facilities located at temporary job sites anywhere in NRC jurisdiction. However, the inspector found that these facilities where these gauges were installed and operated were not temporary job sites, and were not Roxar’s facilities. In addition, the gauges were not under the supervision or control of Roxar personnel.

As previously stated, Roxar’s position was that Roxar did not believe it transferred the sources to its customers. Roxar listed the sources in its inventory file (a computer spreadsheet), because the customers did not have licenses to which the sources could be transferred. Roxar’s 6-month inventories did not include any contact with the users to verify the status or location of the gauges. Roxar stated that it was under the impression that the NRC gave tacit approval of this method of gauge transfer and tracking activity in 2003 by approving the reciprocity request and license application.

The NRC determined that this passive inventory system did not correspond to Roxar having supervision, direct control, or possession of the radioactive material. As such, it appears that Roxar had transferred the gauges to the users, and the users did not have specific licenses that authorized them to receive the gauges. The 29 gauges were only eligible to be transferred to specific licensees for the period between 2003 and 2007. In 2007, the State of Texas approved an amendment to the Sealed Sources and Devices Registry for the Roxar gauge, allowing it to be transferred to general licensees (see Attachment 2).

10 CFR 30.41(a) and (b)(5) require, in part, that no licensee transfer byproduct material except to an entity authorized to receive such byproduct material under the terms of a specific license or general license issued by the Commission or an Agreement State.

On 29 occasions, approximately between 2002 and 2007, Roxar appears to have transferred specifically licensed Roxar gauges, each containing 30 millicuries of cesium-137, to subsea pipeline owners and operators that were not authorized to receive such byproduct material under the terms of a specific license or general license issued by the Commission or Agreement State. These instances were identified as additional examples of the apparent violation of 10 CFR 30.41(a) and (b)(5). (030-36402/09-001-01)

4 Corrective Actions

4.1 Tracerco Gauges

The Tracerco gauge that Roxar transferred to its customer in 2003 was added to the customer's NRC license in 2009. This customer did have an NRC license, however the customer's NRC license at the time of the transfer in 2003 did not authorize it to possess or use the Tracerco gauge. In June 2009, the NRC notified the customer that it was in possession of byproduct material for which it was not licensed. Subsequently, the customer submitted a license amendment to add the Tracerco gauge to its NRC license. The NRC approved the amendment in June 2009, at which point the customer was in compliance with NRC regulations.

Roxar implemented procedures to ensure that, in the future, before transferring a gauge, verification is made that the customer receiving a Tracerco gauge has an NRC or Agreement State specific license. Roxar used this new process for a specifically licensed gauge customer in October 2009. Roxar verified that the customer had an applicable license, and then coordinated delivery and installation of the device through its vendor.

4.2 Current Roxar Gauges

In January 2009, Roxar implemented a new procedure for commercially distributing the Roxar gauges. This new procedure, titled *Gamma certification package for the US*, provided instructions for customers that purchased Roxar gauges. Since February 2007, the Roxar gauges have been eligible to be used by general licensees (see Attachment 2).

The package contained instructions for registering the device with the appropriate state radiation control agency, or with the NRC, depending on location of use. The package contained language which warned that abandoning or disposing the device was prohibited and that Roxar should be contacted for any questions concerning the device.

Roxar submitted a quarterly transfer report to the NRC using NRC FORM 653. The report identified any commercial distributions of Roxar gauges that Roxar made to general licensees during the reporting period. Since January 2009, Roxar has been in compliance with 10 CFR 30.41 requirements.

4.3 Legacy Roxar Gauges

Roxar has not provided corrective actions to address the specifically licensed Roxar gauges that were transferred before the Roxar gauge was modified to be eligible for commercial distribution as a generally licensed gauge. The possessors and users of the gauges incorrectly believe that the radioactive sources in the Roxar gauges are still maintained under Roxar's NRC license.

The modification to the device to qualify as generally licensed did not entail any physical or mechanical changes or upgrades. A second warning label on the exterior of the device was the primary upgrade required by the state of Texas before granting the change to the Sealed Source & Device Registry.

5 Exit Meeting

A preliminary exit briefing was conducted with the RSO at the conclusion of the onsite portion of the inspection on August 4, 2009. A final telephonic exit briefing was conducted with Mr. Steve Twilley of Roxar on July 15, 2011, to review the inspection findings as presented in this report. Mr. Twilley acknowledged the inspector's findings. No proprietary information was identified in this report.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

Steve Twilley, Director North America
Marie Benson, Radiation Safety Officer
Norberto Ortigoza, After Sales Manager
Christopher McPherson, Subsea Sales Manager
Arnold Rivas, Topside Sales Manager

INSPECTION PROCEDURES USED

87124 Fixed and Portable Nuclear Gauges

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

030-36402/09-001-01 AV A violation involving the transfer of byproduct material to entities not authorized to receive, possess, and use it.

Closed

None

Discussed

None

LIST OF ACRONYMS USED

AV	Apparent Violation
CFR	Code of Federal Regulations
EA	Enforcement Action
NRC	Nuclear Regulatory Commission
RSO	Radiation Safety Officer

License and Device History

- 2002
 - Texas issued an Agreement State license to Roxar for possession and use of the Roxar gauge in Texas jurisdiction.

- 2003
 - Texas amended Roxar's Agreement State license to add possession and use of the Tracerco gauge in Texas jurisdiction.
 - Roxar requested, and was granted by the NRC, use of Tracerco and Roxar gauges in NRC jurisdiction using reciprocity of its Agreement State license.
 - Roxar submitted an application to the NRC for an NRC license to possess and use Tracerco and Roxar gauges in NRC jurisdiction.
 - NRC approved the application and granted an NRC license to Roxar for use of Tracerco and Roxar gauges by Roxar at temporary job sites in NRC jurisdiction.

- 2005
 - Texas amended Roxar's Agreement State license to permit commercial distribution of the Roxar gauge.

- 2007
 - Texas amended the Sealed Source & Device Registry for the Roxar gauge to include distribution to specific or general licensees. The amendment was granted, in part, because more descriptive and detailed labels were added to the device. There were no changes to the shielding or physical protection of the device included in the amendment.

- 2009
 - Texas amended Roxar's Agreement State license to permit commercial distribution of the Tracerco. The Tracerco gauge remained eligible for distribution only to specific licensees.

- 2002-2009
 - Roxar transferred 29 specifically licensed fixed gauges to customers for use in exclusive Federal jurisdiction in the Gulf of Mexico.

PREDECISIONAL ENFORCEMENT CONFERENCE AGENDA

ROXAR FLOW MEASUREMENT, INC.
DATE, TIME, AND LOCATION TO BE DETERMINED

1. INTRODUCTIONS/OPENING REMARKS --
ROY CANIANO, DIRECTOR, DIVISION OF NUCLEAR MATERIALS SAFETY
2. ENFORCEMENT PROCESS --
RAY KELLAR, SENIOR ENFORCEMENT SPECIALIST
3. APPARENT VIOLATIONS & REGULATORY CONCERNS --
MICHAEL VASQUEZ, CHIEF, NUCLEAR MATERIALS SAFETY BRANCH A
4. LICENSEE PRESENTATION --
ROXAR FLOW MEASUREMENT, INC.
5. BREAK - 10 MINUTES
6. RESUMPTION OF CONFERENCE
7. CLOSING REMARKS --
ROXAR FLOW MEASUREMENT, INC.
8. CLOSING REMARKS --
ROY CANIANO, DIRECTOR, DIVISION OF NUCLEAR MATERIALS SAFETY