

**NEUTRON PRODUCTS inc**

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Q-5

November 15, 2011

U.S. Nuclear Regulatory Commission, Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415  
Attn: Ms. Betsy Ullrich, Senior Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

Re: License No. 19-25203-01

E-mail response dated November 4, 2011

03038295

Dear Ms. Ullrich,

Thank you for the e-mail regarding our request for an amendment to the referenced license. Following is our response.

1. Thank you for clarification on this issue.
2. We trust that the NRC recognizes that we sell very few sources in this manner and that it is an ancillary part of our teletherapy business. As such, it is our understanding that the amendment authorizing us to distribute will not change the designation of our license to M&D and will not result in a change of the annual fee.
3. Neutron Products is not currently manufacturing teletherapy sources. However, when we were, we followed Neutron Products Specification T-1, Rev.1 (Helium Pressurization Bubble Test) to verify that the sources were leak free. Since we no longer are able to use our hot cell, we rely on other licensees (currently Southwest Research Institute (SwRI)) to perform the leak test on sources we distribute. SwRI performs a visual test for defects and a helium leak test in accordance with ANSI/HAS Standard, *Sealed Radioactive Sources-Classification, ANSI/HAS N-6-1997*.

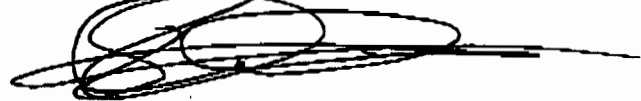
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4. For its licensed activities, Neutron Products will perform surveys and maintain records in accordance with 10 CFR 20.1501 and 20.2103.

Thank you for your consideration in this matter. We look forward to receiving the license amendment.

Sincerely,  
Neutron Products, Inc.

A handwritten signature in black ink, appearing to read 'Edmond J. DeRosa', with a long horizontal line extending to the right.

Edmond J. DeRosa  
Manager, Teletherapy Operations