



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

September 19, 2012

Docket No. 04009007
Control No. 579038

License No. SUB-1551

William L. Ransohoff
Director of Operations
Neutron Products, Incorporated
P.O. Box 68
22301 Mt. Ephraim Road
Dickerson, MD 20842

SUBJECT: NEUTRON PRODUCTS, INCORPORATED, REQUEST FOR ADDITIONAL
INFORMATION CONCERNING APPLICATION FOR RENEWAL OF LICENSE,
CONTROL NO. 579038

Dear Mr. Ransohoff:

This is in reference to your application dated August 24, 2012, requesting to renew Nuclear Regulatory Commission License No. SUB-1551. In your application, it was stated that the radiation safety program was the same at License No. 19-25203-01, however certain commitments need to be made for a proper licensing basis for this license. In order to continue our review, we need the following additional information:

1. Your application should have been signed by a management representative rather than Edmond J. DeRosa. Please submit a letter signed by a management representative indicating that management has reviewed the application and concurs in the statements and representations contained therein. Note also that a management representative should sign all future correspondence that requests a change in your license.
2. You currently have Jerry L. Fogle listed as the only Authorized User. Your application was not specific to who should be designated as an Authorized User. If you wish to have someone other than Mr. Fogle as an Authorized User, then please submit their names along with information demonstrating that the proposed person is qualified by training and experience with your licensed materials.
3. You stated that personnel participate in Neutron's annual source handler training program. In NUREG-1556, Volume 12, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Possession Licenses for Manufacturing and Distribution," Section 8.8, please submit a description of the radiation safety training program, including topics covered, groups of workers, assessment of training, qualifications of instructors, and the method and frequency of training.
4. Your application did not state the type of instruments that would be used to perform surveys nor the instrument's calibration. In NUREG-1556, Volume 12, "Consolidated

Guidance About Materials Licenses Program-Specific Guidance About Possession Licenses for Manufacturing and Distribution,” Section 8.10.2, please provide one of the following:

- A description of the instrumentation that will be used to perform required surveys, and a statement that: “We will use instruments that meet the radiation monitoring instrument specifications published in Appendix K to NUREG-1556, Vol. 12. We reserve the right to upgrade our survey instruments as necessary;” or
 - A description of the instrumentation that will be used to perform required surveys, and a statement that: “We will use instruments that meet the radiation monitoring instrument specifications published in Appendix K to NUREG-1556, Vol. 12. Additionally, we will implement the model survey meter calibration program published in Appendix K to NUREG-1556, Vol. 12. We reserve the right to upgrade our survey instruments as necessary;” or
 - A description of alternative equipment and/or procedures for ensuring that appropriate radiation monitoring equipment will be used during licensed activities and that proper calibration and calibration frequency of survey equipment will be performed. Calibrations may be performed by licensees specifically authorized to provide this service. It is not necessary to have a copy of the instrument manufacturer’s license, but calibration vendors other than the instrument manufacturer must be verified to have authorization to calibrate instruments for others. Further, the statement “We reserve the right to upgrade our survey instruments as necessary and change calibration services to other authorized providers” should be added to the response.
5. Your application did not state that you have accountability procedures. In NUREG-1556, Volume 12, “Consolidated Guidance About Materials Licenses Program-Specific Guidance About Possession Licenses for Manufacturing and Distribution,” Section 8.10.2, please confirm that you have developed a procedure(s) for ensuring material accountability.
6. Your application did not state the method for measuring occupational dose. In NUREG-1556, Volume 12, “Consolidated Guidance About Materials Licenses Program-Specific Guidance About Possession Licenses for Manufacturing and Distribution,” Section 8.10.4, provide either of the following: A statement that: “We have done a prospective evaluation and determined that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20, or we will monitor individuals in accordance with the criteria in the section entitled ‘Radiation Safety Program – Occupational Dose’ in NUREG-1556, Vol. 12, ‘Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Possession Licenses for Manufacturing and Distribution;” or a description of an alternative method for demonstrating compliance with regulations.
7. Your application did not state that you have operating and emergency procedures. In NUREG-1556, Volume 12, “Consolidated Guidance About Materials Licenses Program-Specific Guidance About Possession Licenses for Manufacturing and Distribution,” Section 8.10.6, please confirm that you have operating and emergency procedures.

Additionally state that procedures will be revised only if: (1) the changes are reviewed and approved by the licensee management and the RSO in writing; (2) the licensee staff is provided training in the revised procedures prior to implementation; (3) the changes are in compliance with NRC regulations and the license; and (4) the changes do not degrade the effectiveness of the program.

Please note that the office of the Region I Division of Nuclear Materials Safety has moved effective May 9, 2012. Our new address is:

U. S. Nuclear Regulatory Commission
Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 579038. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5366.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

Original signed by Dennis R. Lawyer

Dennis R. Lawyer
Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

cc:
Edmond J. DeRosa, Radiation Safety Officer

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