



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

September 21, 2012

SABIA, Inc.  
ATTN: James F. Miller  
Radiation Safety Officer  
10911 Technology Place  
San Diego, California 92127

**SUBJECT: REQUEST FOR ADDITIONAL INFORMATION**

The Nuclear Regulatory Commission (NRC) has completed the technical review of SABIA's renewal application of NRC License No. 11-27727-01 dated April 18, 2012, and additional information is needed. Please provide the information indicated below in a signed and dated letter within 10 days of receipt of this letter.

1. The current license lists Barium-133 in condition 6. The renewal application did not request Barium-133. Indicate if the Barium-133 authorization will remain listed in the renewed license or if it needs to be removed. Submit decommissioning records if requesting removal of Barium-133.
2. The renewal application requested to add SABIA Model X1-L. Provide operating procedure for this gauge/device model.
3. The renewal application contained individual's training and experience (T&E) documentation and these were cross referenced with the authorized users named in the current license. No training and experience documentation was submitted for David Burroughs, Thomas Campbell, Jeniece Fresh, Kurtis Hollister, and Phillip J. Robinson, and the renewal application did not contain a request to keep them listed in the renewed license. Indicate if these individuals need to remain listed in the license as authorized users or need to be removed.
4. The April 18, 2012 renewal application contained outdated procedures. SABIA submitted the most current revisions of these procedures on October 23, 2009, and the revised procedures were approved on Amendment 13 to the license. The NRC will use the most current revision of the procedures as indicated in the attached table when renewing this license. Please review the enclosed table for accuracy of the information and confirm that NRC's understanding is correct.

<b>Procedures submitted on October 23, 2009</b>	<b>Procedures submitted on April 18, 2012</b>
SABIA 1002000 Revision B	SABIA 1002000 Revision B
SABIA 1002002 Revision B	SABIA 1002002 Revision B
SABIA 1002003 Revision C	SABIA 1002003 Revision B
Not submitted	SABIA 1002004 Revision D
SABIA 1002011 Revision C	SABIA 1002011 Revision B
SABIA 1002012 Revision C	SABIA 1002012 Revision B
SABIA 1002014 Revision C	SABIA 1002014 Revision B
SABIA 1002015 Revision C	SABIA 1002015 Revision B
SABIA 1002016 Revision C	SABIA 1002016 Revision B
SABIA 1002051 Revision B	SABIA 1002051 Revision A
SABIA 1002052 Revision A	SABIA 1002052 Revision A
SABIA 1002053 Revision B	SABIA 1002053 Revision A
SABIA 1002054 Revision B	SABIA 1002054 Revision A
SABIA 1002055 Revision B	SABIA 1002055 Revision A
SABIA 1002056 Revision B	SABIA 1002056 Revision A
SABIA 1002057 Revision A	SABIA 1002057 Revision A
SABIA 1002058 Revision B	SABIA 1002058 Revision A
SABIA 1002059 Revision B	SABIA 1002059 Revision A
SABIA 1002060 Revision B	SABIA 1002060 Revision A
SABIA 1002061 Revision B	SABIA 1002061 Revision A
SABIA 1002062 Revision B	SABIA 1002062 Revision A
SABIA 1002063 Revision B	SABIA 1002063 Revision A
SABIA 1002064 Revision B	SABIA 1002064 Revision A
SABIA 1002065 Revision B	SABIA 1002065 Revision A
SABIA 1002066 Revision B	SABIA 1002066 Revision A
SABIA 1002067 Revision B	SABIA 1002067 Revision A

5. The renewal application contains procedure 10022012 for gauge installation, gauge removal and non-routine maintenance on gauges. Indicate whether or not SABIA is requesting authorization to perform gauge installation, gauge removal, and non-routine maintenance on gauges at temporary job sites in NRC jurisdiction.
6. The renewal application contains procedure 10022014 for source installation into devices and source removal from devices. This procedure is specific only to devices using californium 252 (Cf-252) sources. Condition 9.A. through 9.D. of SABIA's current license authorizes source replacement on devices that contain sources other than Cf-252.
  - A. State whether or not SABIA is requesting authorization to perform source installation into devices and source removal from devices, limited to Cf-252 sources, at temporary job sites in NRC jurisdiction.
  - B. State whether or not SABIA is requesting authorization to perform source installation into devices and source removal from devices, for all types of radionuclides in devices that are currently authorized in the license not just Cf-252, at temporary job sites in NRC jurisdiction. If seeking this authorization then provide revised procedure 10022014 that is not specific to Cf-252 sources, or provide another operating procedure that is generic for all radionuclides.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Thank you for your cooperation.

Sincerely,

**/RA/**

Roberto J. Torres, Senior Health Physicist  
Nuclear Materials Safety Branch B

Docket: 030-35997  
License: 11-27727-01  
Control: 577408