

NEUTRON PRODUCTS Inc

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12 November 2012

U.S. Nuclear Regulatory Commission, Region 1
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713
Attn: Mr. Dennis R. Lawyer, Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

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RECEIVED 11/13/12

Re: Mail Control No. 579038
License No: SUB-1551

Dear Mr. Lawyer,

In response to the clarifications you requested during our recent conversations, we hereby request that our October 17, 2012 letter be withdrawn and replaced with this letter. Our numbered responses match the numbered paragraphs in your letter of September 19, 2012.

1. In addition to being the RSO named on the referenced license, Mr. DeRosa is also the manager of that division, and has long been recognized as a representative of Neutron's management. That said, I reviewed the application at the time of its submittal, and was in agreement with the statements and representations contained therein. Since receiving your letter, I have reviewed the information again and my position has not changed.
2. Thank you for raising this issue. In addition to Mr. Jerry Fogle, we request that Mr. Edmond DeRosa, Mr. Kenric Tingle, and Mr. Leslie Forrest also be named as Authorized Users on the referenced SUB-1551 license. Mr. DeRosa is the RSO of the SUB-1551 and 19-25203-01 licenses, and Mr. Fogle, Mr. Tingle, and Mr. Forrest are all licensed source handlers and are named users on Neutron's other license 19-25203-01 issued by the NRC.
3. Individuals working under the SUB-1551 license are also named users on Neutron's NRC license 19-25203-01 and as such have gone through our Teletherapy Source Handler Training Program which consists of classroom and on-the-job training. Some of the topics typically covered during training include: the importance of training, atomic structure, atomic radiation (alpha, beta, gamma), radiation units, devices used to measure radiation dose and exposure rate, ALARA, biological effects of ionizing radiation, NRC Reg Guide 8.29, procedures, emergency planning, and NRC radiation regulations. Assessment of the training is done by evaluation of on-the-job performance and written and oral tests. Instructors include active source handlers, licensed Radiation Safety Officers or ex-RSOs, outside consultants, regulators, or Neutron's President. Training is provided for all employees who work with radioactive material, and retraining is performed annually.

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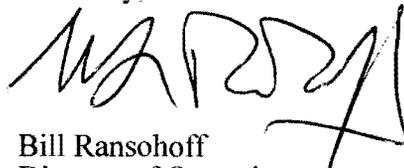
NMSS/RGN1 MATERIALS-002

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4. Neutron performs semi-annual dose rate and contamination surveys of our facility under the SUB-1551 license. Dose rate surveys are performed on-site using survey instruments such as the Eberline E-120 and Ludlum 2401-EC2, and these instruments are calibrated periodically and no less often than annually against a source that is traceable to the National Institute for Standards and Technology. Wipe test smears are bagged and brought to our Dickerson, Maryland facility to be counted, using a Ludlum 2200 CPM instrument. The Ludlum 2200 is calibrated monthly against sources that are traceable to the National Institute for Standards and Technology. 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.
5. Material accountability for our SUB-1551 license is addressed in Neutron's Procedure R-2503, Receipt and Storage of Depleted Uranium and Teletherapy Units, a copy of which was previously submitted.
6. Occupational exposure is addressed in Neutron's document entitled Control of Occupational Exposure in Teletherapy Operations. In particular, Sections 4.1 and 9.6 address the issue for the Ranson facility, which is the subject of the SUB-1551 license. These sections support our 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.
7. Neutron Products confirms that it has developed and implemented adequate operating, safety, and emergency procedures for the SUB-1551 license. These procedures will be revised only if: (1) the changes are reviewed and approved by Neutron's management and the RSO in writing; (2) Neutron's 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.

I believe this letter to be totally responsive to the issues you have raised. If, however, you need additional information please do not hesitate to contact me or Ed DeRosa.

Sincerely,



Bill Ransohoff
Director of Operations
Neutron Products inc

NEUTRON PRODUCTS inc