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7 January 2013

Stephen Hammann  
Senior Health Physicist  
Decommissioning Branch  
Division of Nuclear Materials Safety  
Nuclear Regulatory Commission  
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License No. 20-35022-01

SUBJECT: Addendum to NRC request for additional information dated 20 December, 2012.

**Dear Mr. Hammann,**

The below information is provided as requested in your memorandum dated 20 December, 2012 in support of CSMI's NRC Sealed Source Service Provider's License request.

**1. Regarding item 5 of your application, identify all the sealed sources you wish to service by radioisotope, manufacturer (or distributor), model number and the maximum amount of licensed material in the source. Confirm that each sealed source, device, and source/device combination is registered as an approved sealed source or device by NRC or an Agreement State. Confirm that the activity per source and the maximum activity per device will not exceed the maximum activity listed on the approved certificate of registration issued by the NRC or by an Agreement State. Refer to section 8.5.1 of NUREG-1556, Vol. 18, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Serviced Provider Licenses" (NUREG-1556, Vo. 18)**

- Identify each radionuclide that will be possessed in each sealed source and/or device.
  - SAIC MVACIS CA-0215-D-107-S Co-60 .75 Curie
  - SAIC Military VACIS CA-0215-D-106-S Co-60 .75 Curie
  - SAIC Rapid Deployable VACIS CA-0215-D-110-S Co-60 .75 Curie
  - Rapiscan GaRDS Gantry CA-1218-D-102-S Co-60 1 curie



- Rapiscan GaRDS Portal NC-1218-D-104-S Cs-137 2 curies
- Identify the manufacturer or distributor and model number of each type of sealed source and/or device requested.
  - SAIC MVACIS CA-0215-D-107-S Mobile VACIS Ohmart Vega
  - SAIC Military VACIS CA-0215-D-106-S Military Mobile VACIS Ohmart Vega
  - SAIC Rapid Deployable VACIS CA-0215-D-110-S Mobile VACIS RD Ohmart Vega
  - Rapiscan GaRDS Gantry CA-1218-D-102-S GaRDS Gantry Isotope Products Laboratories Model P04 Series
  - Rapiscan GaRDS Portal NC-1218-D-104-S GaRDS Portal J.L. Shepherd & Associates Model 81-8 EXT
- Confirm that each sealed source, device, and source/device combination is registered as an approved sealed source or device by NRC or an Agreement State.
  - We confirm that each sealed source, device, and source/device combination is registered as an approved sealed source or device by NRC or an Agreement State.
- Confirm that the activity per source and maximum activity per device will not exceed the maximum activity listed on the approved certificate of registration issued by NRC or by an Agreement State.
  - We confirm that the activity per source and maximum activity per device will not exceed the maximum activity listed on the approved certificate of registration issued by NRC or by an Agreement State.
- Identify the special circumstances under which sealed sources and/or devices that are not registered by NRC or an Agreement State may be possessed, used, or serviced.
  - There will be no circumstances where CSMI as the service provider will possess, use or service sealed sources not registered with the NRC or an Agreement State

**2. Regarding item 6 of your application, provide specific information regarding the purpose for which the licensed material will be used. Refer to section 8.6 of NUREG-1556, Vol. 18**

**PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED:**

- Leak Test Service Providers



- Possession will be for use in performing commercial leak test services.
- Service Provider Licensees Providing Services on Devices Container Sealed Sources:
  - Possession “incident to performing services” on sealed sources and/or devices will be used for purpose of performing commercial:
  - Installation
  - Radiation Surveys
  - Removal
  - Disposal
  - Relocation
  - Repair
  - Source Exchange
  - Maintenance
  - Source Retrieval
  - Transportation
  - Leak Test Sample Acquisition
  - Customer training and instruction in the proper use of device(s) and for conducting routine, and in some situations, non-routine maintenance of device(s);
  - Packaging, repackaging, and transportation
  - Other Services not identified above, excluding activities involving critical mass quantities of special nuclear materials; Screening of cargo containers and vehicles

**3. Verify that the licensed material will be serviced at temporary job sites. Please provide the locations of the temporary job sites.**

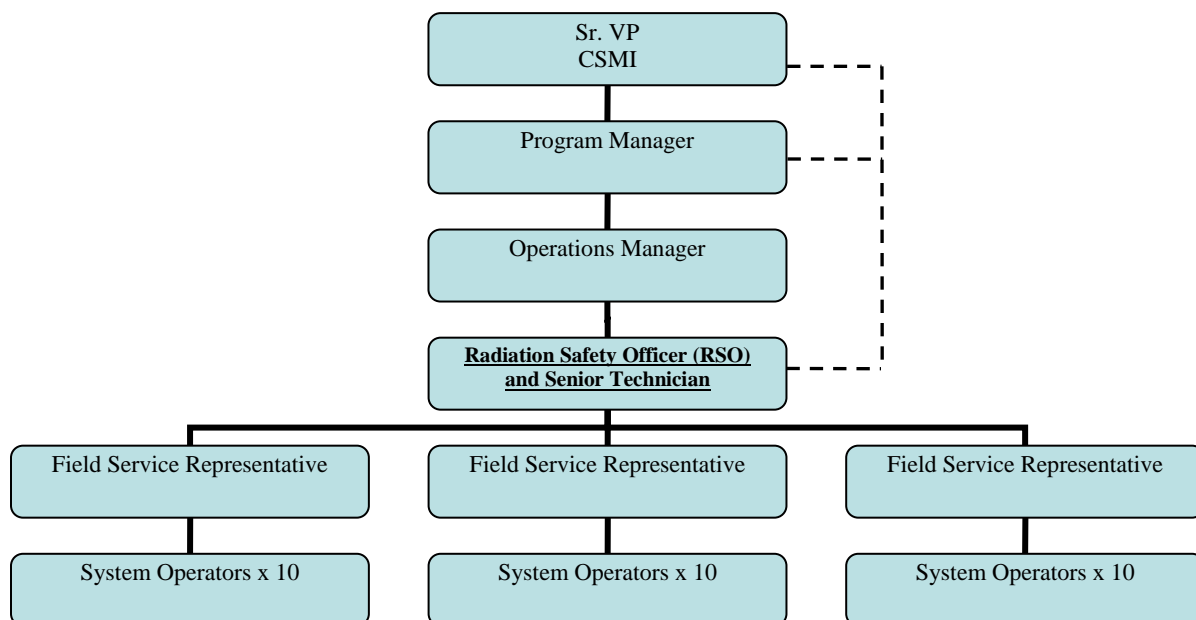
Sealed Sources will be serviced at temporary job sites. Locations of temporary job sites will be on US Government property as determined by the US Government organization that utilizes the Seal Source devices. These locations have yet to be determined but will include US Military bases in the United States.

**4. Regarding Item 6 of your application, please describe the RSO’s SAIC Field Service Representative radiation safety training, including the location, dates, and duration of the training. Also, provide a more complete organizational chart showing the RSO’s independence and direct communication with responsible management officials and demonstrating day-to-day oversight of the radiation safety activities. This information should not include personally identifiable information (PII), which is social security number, birth date, home phone number, etc. Please refer to section 8.7.1 of NUREG-1556, Vol. 18.**

- The name of the proposed RSO who will be responsible for ensuring that the licensee’s radiation safety program is implemented in accordance with approved procedures:
  - Roberto Bahday – RSO



- Demonstrate that the RSO has sufficient independence and direct communication with responsible management officials by providing a copy of an organizational chart by position, demonstrating day-to-day oversight of the radiation safety activities.
  - The RSO reports directly to the Operations manager as depicted in the Organizational Chart below. The RSO also has direct communications with the Program Manager and the Senior VP when safety issues need to be elevated to the appropriate level.
  - All Field Service Representatives and System Operators perform services and operations under the direction of the RSO.



The specific training and experience of the RSO.

- Training and Experience:
  - SAIC Field Service Representative radiation safety training
  - Radiation Safety Officer Course presented by Nevada Technical Associated, Inc. – 2005
  - Since 2005 has administered radiation safety program for system operators
  - Performs daily radiation surveys
  - Administers annual training and refresher training to system operators
  - Manages calibration schedule for radiation meters
  - Assisted manufacturer with sealed source replacement
  - Submits service reports



Include the specific dates of training in radiation safety.

- Training:
  - Radiation Safety Officer Course presented by Nevada Technical Associates, Inc.
    - Las Vegas Nevada
    - March 2005
    - 40 Hours
  - SAIC Field Service Representative radiation safety training
    - San Diego
    - January 2005
    - 40 Hours

**5. Please verify that the authorized users have received and/or will receive training regarding each specific device to be serviced. Please provide a description of the training and the dates of training. This information should not include PII. Please refer to 8.7.2 of NUREG-1556, Vol. 18.**

Before using licensed material, authorized users will receive the training described in Appendix H of NUREG-1556, Vol. 18, 'Consolidated Guidance About Materials Licenses; Program-Specific Guidance About Service Provider Licenses,' dated November 2000.

#### **Description of Training and Dates**

Initial Field Service Representative technical training was held in January of 2005 at the SAIC Facility in Rancho San Bernardo, California. Training was 80 hours in duration. Future training sessions for service providers will be held at OEM facilities, the location and duration of which will be dependent on the specific system that is to be serviced by CSMI personnel. Below is a general description of the initial technical training provided by SAIC:

- Day 1: General overview / system deployment / scanning operation and sequence
- Day 2: Detectors / EBs/ adjustments and schematics
- Day 3: Hydraulics / operations / schematics
- Day 4: Source capsule / source shutter motor / Emergency override procedures
- Day 5: Hands on training and trouble shooting
- Day 6: Auragen (Generator) / Electronic Control Unit (ECU)/schematics
- Day 7: Electronic equipment / Module identification and training
- Day 8: System failures and troubleshooting techniques
- Day 9: Hands on Training
- Day 10: End of course testing



**6. List any other classification of personnel who will require radiation safety training and describe the radiation safety training program, including topics covered, groups of workers, assessment of training, qualifications of instructors, and the method and frequency of training that will be provided to individuals working or frequenting restricted areas. Please refer to Sections 8.7.3 and 8.8 of NUREG-1556, Vol. 18.**

“Before using licensed materials, ancillary personnel will have successfully completed the Classroom Training portion of the training course described in Appendix H in NUREG-1556, Vol. 18, ‘Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Service Provider Licenses,’ dated November 2000.”

Below is 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.

#### **Classification of Personnel Requiring Radiation Safety Training**

Radiation training is provided to Field Service Representatives, System Operators, Field Managers and other selected personnel. Instructors must be RSO certified and factory certified on the equipment that they are providing training on. Training is conducted by lecture, slide presentation and individual handouts in both a classroom and practical hands-on setting to ensure that all concepts and procedures are thoroughly understood.

#### **Assessment of training:**

- Radiation Safety Training is supervised by a RSO qualified representative of the system manufacturer
- All radiation safety training materials are provided by the system manufacturer

#### **Frequency of training:**

- Before assuming duties with, or in the vicinity of, radioactive materials;
- Whenever there is a significant change in duties, regulations, or the terms and conditions of the license;
- Annually for refresher training

#### **Radiation Safety training consists of the following main topics:**

1. Definition of Radiation and Terms
2. Sources of Radiation
3. Biological Effects of Radiation



4. Radiation Detection and Monitoring
  5. Radiation Protection Techniques
  6. Regulatory Requirements
  7. Operational System Basic Overview
  8. Additional Controls and Emergency Procedures
- Attachment 1: Table of Elements  
Attachment 2: Table of Nuclides  
Attachment 3: Metric Prefixes  
Attachment 4: Radiation Surveys  
Glossary and Abbreviations

**7. Regarding leak testing and analysis, please state that you will commit to Appendix O of NUREG-1556, Vol. 18.**

CSMI commits to following the procedures and guidance provided in Appendix O, Model Leak Test Program of NUREG-1556, Vol. 18.

CSMI FSRs perform Leak Tests but do not perform Analysis. Analysis will be the responsibility of the Manufacturer or the Authorized Distributer.

Please feel free to contact me at any time if you have questions or need additional information at 1 (978) 989-9460.

Respectfully submitted,

Randall Kaminsky  
Senior Vice President  
CSMI, LLC