

**From:** [COMO Ronald \(CANBERRA\)](#)  
**To:** [Ullrich, Elizabeth](#)  
**Cc:** [dave.gelpke@canberra.com](mailto:dave.gelpke@canberra.com); [terry.schwager@canberra.com](mailto:terry.schwager@canberra.com)  
**Subject:** RE: additional questions about your response letter dated December 6, 2012 - please read before today's call.  
**Date:** Thursday, January 17, 2013 5:04:59 PM

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Hello Elizabeth,

As per our telephone conference we compiled the paragraphs below in reference to question two.

Also what other information would you require to help in this renal?

We use a multitude of sources that are typically under 1 mCi beta-gamma (such as Ba, Cs, Co, Cd, I) or 10 uCi alpha (Am, Po).

Those sources above these limits are, but not limited to, in Eckert and Ziegler capsule model numbers #A3011, A3014, A1830, A3616 or equivalents.

A customer orders CANBERRA equipment and a source from our catalog. That source is used as a reference or calibration standard in the assembly and characterization of the customer's equipment. We do not incorporate sources into our product.

These sources in Items 6/7/8 I and 6/7/8 J are also used as tools for research and development of new product, testing and calibration, within our processes in the development of new product.

Thank you

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**From:** Ullrich, Elizabeth [mailto:Elizabeth.Ullrich@nrc.gov]

**Sent:** Thursday, January 10, 2013 8:42 AM

**To:** COMO Ronald (CANBERRA)

**Cc:** Gaskins, Farrah; Lawyer, Dennis

**Subject:** additional questions about your response letter dated December 6, 2012 - please read before today's call.

License No. 06-15099-01

Docket No. 030-08562

Control No. 579209

Mr. Como,

We have a few additional items that require additional information, based on our review of the December 6, 2012 letter.

1. Your response to Item 5 stated that you "...will maintain a source inventory..." to demonstrate that you don't exceed the quantities for financial assurance. That is acceptable, if you mean that you will track all radioactive materials, whether they are sealed sources or not. It is actually unsealed radioactive materials that have the lowest limits for the financial assurance requirements.
2. Your response to Item 6 states that you do distribute radioactive material, but do not manufacture that material. The NRC does not distinguish between the two activities; if you are distributing, we still fall under the manufacturer/distributor category, we still have to know that the sources you are distributing meet the 10 CFR 32.210 requirements. We probably should discuss this on today's call, so that we understand what kinds of sources are distributed. If they are distributed to persons who hold a specific license, that has different requirements than if they are sources possessed under a general license, or sources that are exempt from licensing.
3. Your current license does not authorize Item 6/7/8 N (Cs137 source in the JL Shepherd calibrator) or 6/7/8 CC (Pu sources) for temporary job sites. Unless you provide procedures for temporary job site activities with these sources, we will continue to list these as for use only at your fixed location.

Thanks,

Betsy

Betsy Ullrich, MS, CHP

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