

Association of Device Distributors and Manufacturers (ADDM)  
17 Norfolk Rd., Holbrook, MA 02343  
[www.addm.us](http://www.addm.us)

*Advocates for Fair and Consistent Regulation*

ABB Inc.

Baker Hughes, Inc.

Berthold Technologies USA LLC  
February 19, 2013

Honeywell International, Inc.

Margie Kotzalas  
Acting Branch Chief  
NMSS  
US Nuclear Regulatory Commission

Industrial Maintenance Services, Inc. (IMS Corp)

11555 Rockville Pike  
Rockville, MD 20852

Dear Ms. Kotzalas:

Industrial Nuclear Company, Inc.

This letter is a follow up to my email from January 18, 2013. I have not yet received a reply.

IRSC, Inc.

We hereby request a regulatory opinion on the following questions. We request that these questions be reviewed by the NRC legal office, and that we receive a written reply on NRC letterhead.

Metso Automation USA, Inc.

Morpho Detection, Inc.

Is it necessary for a service provider to be listed on a sealed source and device registration in order to service that product? If so, are there any distinctions to this requirement in regards to the device being approved for use under a specific license device, general license or exemption? Please provide any regulation or regulatory guide reference which supports your reply.

QSA Global, Inc.

Rapiscan Systems

RMD, Inc.

We understand that a specific license is required by the NRC or an Agreement State in order to service devices containing radioactive sources, and that it is common practice for secondary (subcontract) manufacturers of devices to be listed on SS&D's in addition to the primary manufacturer/distributor.

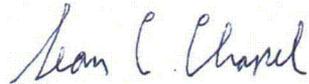
Source Production and Equipment

We were recently informed by Bruce Carrico of the NRC that it is a requirement that service providers be listed on the SS&D, however it does not seem to make a lot of sense from a practical point of view. Often times competitors are licensed to service

each other's products, but it would be impractical to be listed on each other's device registration.

Please send me confirmation that you have received this letter. If you have any questions please call me at 781.767.2176 or email me at [schapel@irsc-inc.com](mailto:schapel@irsc-inc.com).

Sincerely,

A handwritten signature in blue ink that reads "Sean C. Chapel". The signature is written in a cursive style with a large initial 'S'.

Sean C. Chapel,  
President, ADDM

President, IRSC, Inc.



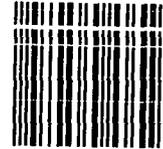
**CERTIFIED MAIL**



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Margie Kotzalas  
Acting Branch Chief  
NMSS  
US Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

**RETURN RECEIPT  
REQUESTED**

20852\$2739 C048



NRC FORM 253 (9-96)		U.S. NUCLEAR REGULATORY COMMISSION		DATE OF REQUEST 2-26-13	CONTROL NUMBER
MESSENGER/COURIER RECEIPT					
TO: Margie Kotzalas		OFFICE FSME	BUILDING TWFN	ROOM NUMBER 8E24	
FROM: IRSC		OFFICE ADM	BUILDING OWFN	ROOM NUMBER P1-C10	
DESCRIPTION USPS Certified letter 7010 2780 0001 0110 2404		MESSENGER/COURIER SIGNATURE			
		MESSENGER/COURIER MEC		DATE RECEIVED 2-26	
				TIME RECEIVED 8am	
		MESSENGER/COURIER		DATE RECEIVED	
				TIME RECEIVED	
		RECIPIENT'S SIGNATURE			
		RECIPIENT Tyleal		DATE RECEIVED 2/26/13	
				TIME RECEIVED 2:48 PM	
SENDER: 1. Complete "DATE OF REQUEST," "TO:," "FROM:," and unclassified "DESCRIPTION" blocks. 2. Obtain MESSENGER/COURIER signature, date received, and time received in first blocks provided. 3. Retain "SENDER'S SUSPENSE COPY."		MESSENGER/COURIER: 1. Deliver package to recipient or next messenger/courier enroute to addressee. 2. Obtain MESSENGER/COURIER or RECIPIENT signature, date received, and time received in the appropriate blocks provided.		RECIPIENT: 1. Provide signature, date received, and time received in the appropriate blocks. 2. Retain RECIPIENT'S COPY. 3. Return original to messenger/courier immediately, who will return it to the sender.	

NRC FORM 253 (9-96)

RECIPIENT'S COPY