

From: [Modes, Kathy](#)
To: ["S And D Rhoe"](#)
Subject: RE: request to add calibrator to your service provider license
Date: Monday, April 15, 2013 9:46:00 AM

The additional info did not include a statement that you will follow the Operating Manual.

From: S And D Rhoe [mailto:crmidmr@aol.com]
Sent: Tuesday, March 26, 2013 6:25 PM
To: Modes, Kathy
Subject: Re: request to add calibrator to your service provider license

Attached is the additional information that you requested.

-----Original Message-----

From: Modes, Kathy <Kathy.Modes@nrc.gov>
To: S And D Rhoe <crmidmr@aol.com>
Sent: Fri, Mar 22, 2013 2:18 pm
Subject: RE: request to add calibrator to your service provider license

CRMI / 52-25430-01 / 030-34704 / 580204

Dear Mr. Rhoe,

As stated in my previous email, we need the following information:

A copy of your operating and your emergency procedures for this activity (make sure you include your ALARA program, also note which survey meter you will use); and

A facility diagram (identify area where calibrator will be and any shielding materials).

Please note that the Model 773 calibrator's Sealed Source and Device Registration (No. MA-0159-D-114-S) states the following under the Limitations and/or Conditions of Use Section:

An Operating Manual is distributed with each device and should be followed by the user.

The Manual includes instruction that during use of this calibrator, never assume the position of the radiation source.

Always conduct a thorough confirmatory survey using a calibrated and operable survey meter to verify the location of the radiation source.

It is important that you have written operating and emergency procedures. Please provide your step-by-step operating procedures and your written emergency procedures (e.g., stuck source, over-exposure event, fire, earthquake, hurricane, device topples over, etc.). Emergency procedures should address all likely situations.

Your cooperation is appreciated.

Kathy Modes

Sr. Health Physicist
Decommissioning Branch
US NRC Region I DNMS
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713
phone: 610-337-5251
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email: kathy.modes@nrc.gov

 Please consider the environment before printing this e-mail.

From: S And D Rhoe [<mailto:crmidmr@aol.com>]
Sent: Friday, March 22, 2013 10:50 AM
To: Modes, Kathy
Subject: Re: request to add calibrator to your service provider license

The two letters that you requested will be faxed today. Thanks!

-----Original Message-----

From: Modes, Kathy <Kathy.Modes@nrc.gov>
To: Crmidmr <Crmidmr@aol.com>
Sent: Thu, Mar 14, 2013 8:42 am
Subject: RE: request to add calibrator to your service provider license

Dear Mr. Rhoe,

We cannot accept an email. We need a letter with your signature.
And I will need the information requested yesterday (see highlighted below).
Please note that the written agreement between you and University should also be signed by both parties.

Thanks,
Kathy

From: Crmidmr@aol.com [<mailto:Crmidmr@aol.com>]
Sent: Wednesday, March 13, 2013 7:06 PM
To: Modes, Kathy
Subject: Re: request to add calibrator to your service provider license

Dear Ms. Modes,

What I need authorization is to use the UCC calibration source under my license. That does not mean that I have the source; it will remain at UCC and all the calibrations will be done there. I will just use it there.

This process has been going on ever since UCC bought the source. It is an Amersham model No. 77302 with 165 mCi of Cs137.

The UCC NRC License number is 52-23059-01 in case you need additional information about the source.

In regards to removing the source from my license in 2008, this was done because I was planning to buy my own calibration source, which is no longer necessary.

This confusion is generated by a comment from a license reviewer stating that UCC needed a service provider license but I already have mine so it is not necessary for them to get another one.

I hope this clarifies the situation. Please do not hesitate to call me if deemed necessary.

Thanks.

In a message dated 3/13/2013 5:13:10 P.M. Atlantic Standard Time, Kathy.Modes@nrc.gov writes:

CRMI (52-25430-01; 030-34704; 03225)

Dear Mr. David Rhoe,

As we discussed on 10/16/2008 during the renewal process, in order for us to add the University's calibrator to your service provider license, we will need the following:

The manufacturer's name and **model number of the device** and the source model number.
The location of the calibrator (we will use this address in license condition 10).

Based on our conversation at the time, you indicated that we should remove this source from your license because you were using it under the University's license. So your license was renewed in 2008 without this source based on our conversation.

In your email to Mr. Lawyer on 3/12/2013, you requested to add the Cs-137 source to your license and you would like this conducted as soon as possible. In order for us to amend your license, we will need the information listed above as well as the following additional information:

A copy of a written agreement between you and the university that authorizes this use.

A copy of your operating and your emergency procedures for this activity (make sure you include your ALARA program, also note which survey meter you will use)

Confirm that you will use the sealed source device in conformance with the Sealed Source and Device registration.

Either commit to use dosimetry or perform a prospective evaluation.

Inform us as to what you will be calibrating (survey meters, dosimeters, etc.)

Please confirm if you will only take the leak test or if you will also analyze the leak test OR if the University will have responsibility for leak testing (this should be in the written agreement).

If the instrument calibrator is NOT designed to emit a collimated beam for the purpose of instrument calibration, then submit a facility diagram (identify area where calibrator will be and any shielding materials).

Please let me know if you will conduct any non-routine maintenance on the device.

I am using NUREG-1556 Volume 18. This is the information needed to add this to your

license. Please review Appendix C from NUREG-1556 Volume 18 in case I missed some other important details.

Thanks,

Kathy Modes

Senior Health Physicist

Decommissioning Branch

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