

**From:** [Walther-Meade, George E.](#)  
**To:** [Rodriguez-Luccioni, Hector](#)  
**Subject:** RE: 2.206 Petition: PRB's decision on immediate enforcement action  
**Date:** Wednesday, September 11, 2013 1:29:38 PM  
**Attachments:** [image002.png](#)  
[SAIC NRC Presentation Final v1.pdf](#)

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Hello Hector,

During the public meeting yesterday, a question was asked by Region 1 concerning the SSDRs. Dan Madson, SAIC RSO, attempted to respond, however, needed to verify his records to provide an accurate answer.

The verified response to the question is below for the PRB to include and consider as additional information:

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On January 6, 2010, SAIC requested that the California Radiological Health Branch deactivate CA-0215-D-103-S (Mobile VACIS Cesium), CA-0215-D-106-S (Military Mobile), and CA-0215-D-107-S (Mobile VACIS Cobalt). The information in these registries were all incorporated into and superseded by the September 14, 2010, release of CA-0215-D-110-S (Mobile VACIS RD).

The current version of Mobile VACIS RD (CA-2015-D-110-S) is dated March 12, 2013 which was modified to address the unique features of the VACIS GT variant of the mobile platform.

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On a separate note, the presentation from yesterday had a typo in the header on slide 7. Previously, it was titled Relocatable VACIS whereas the system in the picture is VACIS GT. Attached is a revised presentation to reflect that correction.

Please let me know if you have any questions.

Thank you,  
George

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Portions of SAIC to be renamed Leidos, Inc., subject to stockholder approval and consummation of a separation

transaction if approved by SAIC board of directors.

**NATIONAL SECURITY | HEALTH | ENGINEERING**

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**From:** prvs=9593163db=Hector.Rodriguez-Luccioni@nrc.gov  
[mailto:prvs=9593163db=Hector.Rodriguez-Luccioni@nrc.gov] **On Behalf Of** Rodriguez-Luccioni, Hector

**Sent:** Wednesday, September 11, 2013 8:04 AM

**To:** Walther-Meade, George E.

**Subject:** 2.206 Petition: PRB's decision on immediate enforcement action

Greetings George,

The PRB met on September 3, 2013, to consider the immediate enforcement action requested in the petition to revoke CSMI's license #20-35022-01. The PRB determined that it needs more information before it can make this decision.

You had an opportunity to address the PRB via a public meeting on Tuesday, September 10, 2013, to discuss the petition before the PRB makes its recommendation to accept or reject the petition for review. The PRB will meet in the next few weeks to review the new information provided during the public meeting and will make a recommendation and will revisit your immediate enforcement action request. After the PRB meets I will inform you of the outcome of the meeting.

If you have any questions please let me know.

Thank you very much.

*Hector Luis Rodriguez-Luccioni, Ph.D.*

*U.S. Nuclear Regulatory Commission*

*Office of Federal and State Materials and Environmental Management Programs*

*Division of Materials Safety and State Agreements*

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# SAIC

## 10 CFR 2.206 Petition (NRC License 20-35022-01)

**George Walther-Meade**, Director of Client Services  
10 September 2013

# **Introduction**

**Background Information**

# SAIC Security and Transportation Technology

## SAIC Corporate Overview

- **Founded in 1969**
- **FORTUNE 500® company**
- **\$10.6 billion FY12 revenues**
- **Over 40,000 employees**
- **Provides scientific, engineering, and technology applications**
- **Solves problems of vital importance to the nation and the world in national security, energy and the environment, critical infrastructure, and health**



FORTUNE 500 is a registered trademark of Time, Inc. in the United States and/or other countries.

# SAIC Security and Transportation Technology

## Business Unit Overview

- Provides advanced technologies, proven products and custom solutions to serve
  - Customs authorities
  - Military agencies
  - Airport authorities
  - Law enforcement agencies
  - Terminal operators
  - Emergency first responders
  - Industrial and manufacturing companies
- Helps improve safety and security
- Helps increase productivity and efficiency
- Helps reduce costs



# Mil-Mobile VACIS<sup>®</sup> Imaging System

## Product Overview

Detector array

Source cart trailer

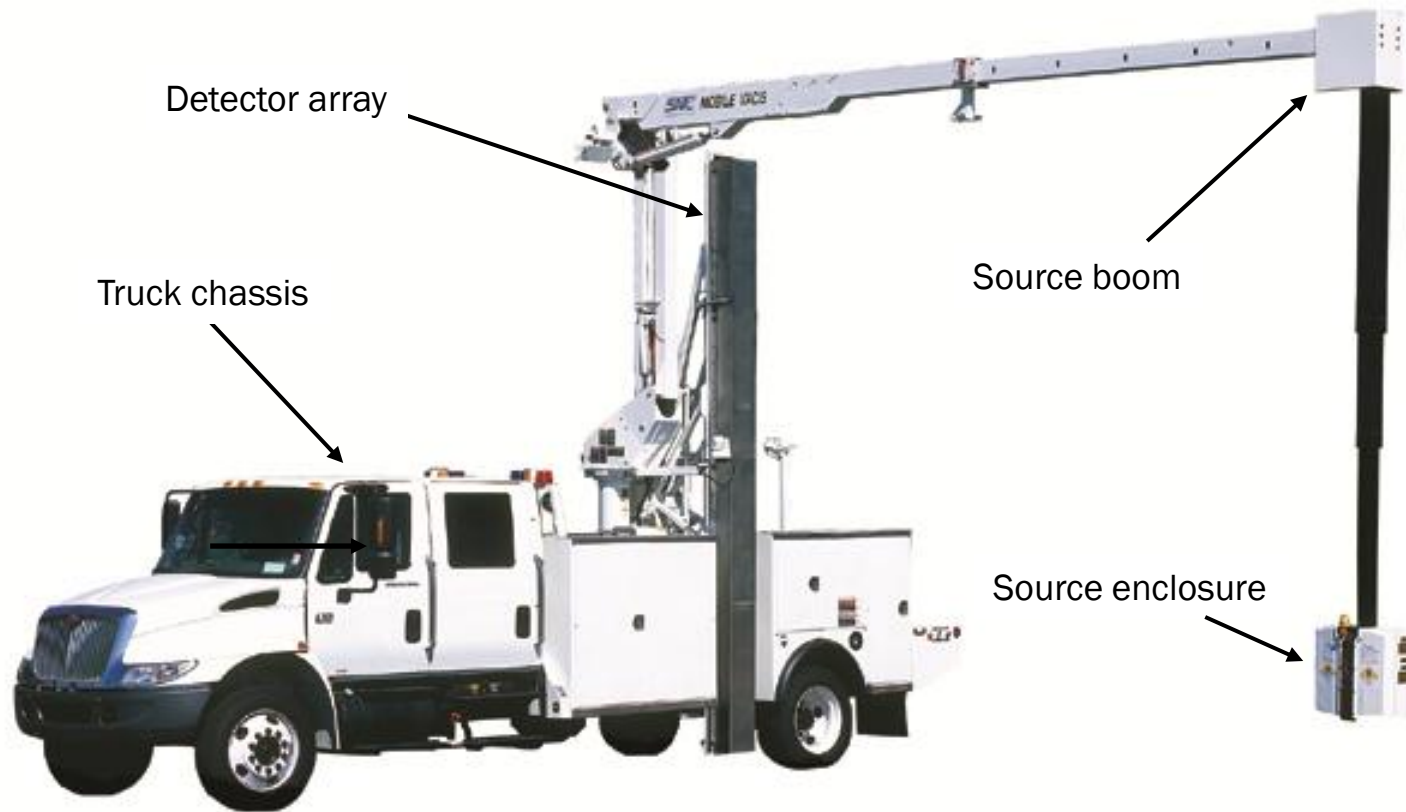


Main vehicle (M1114 HMMWV)

Source cart

# Mobile VACIS® Imaging System

## Product Overview



# VACIS® GT Imaging System

## Product Overview

Detector array

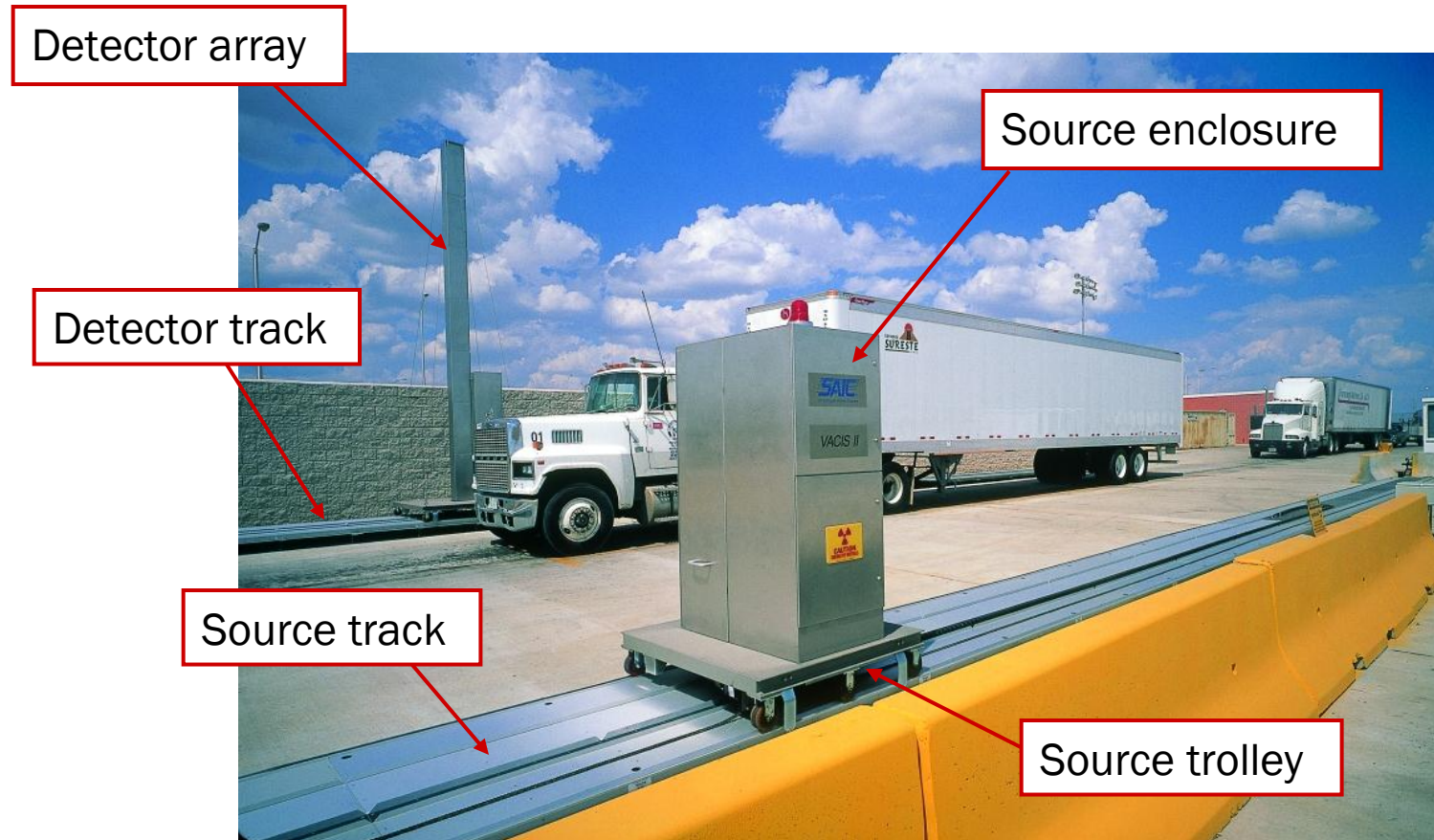


Source cart

Towable detector trailer

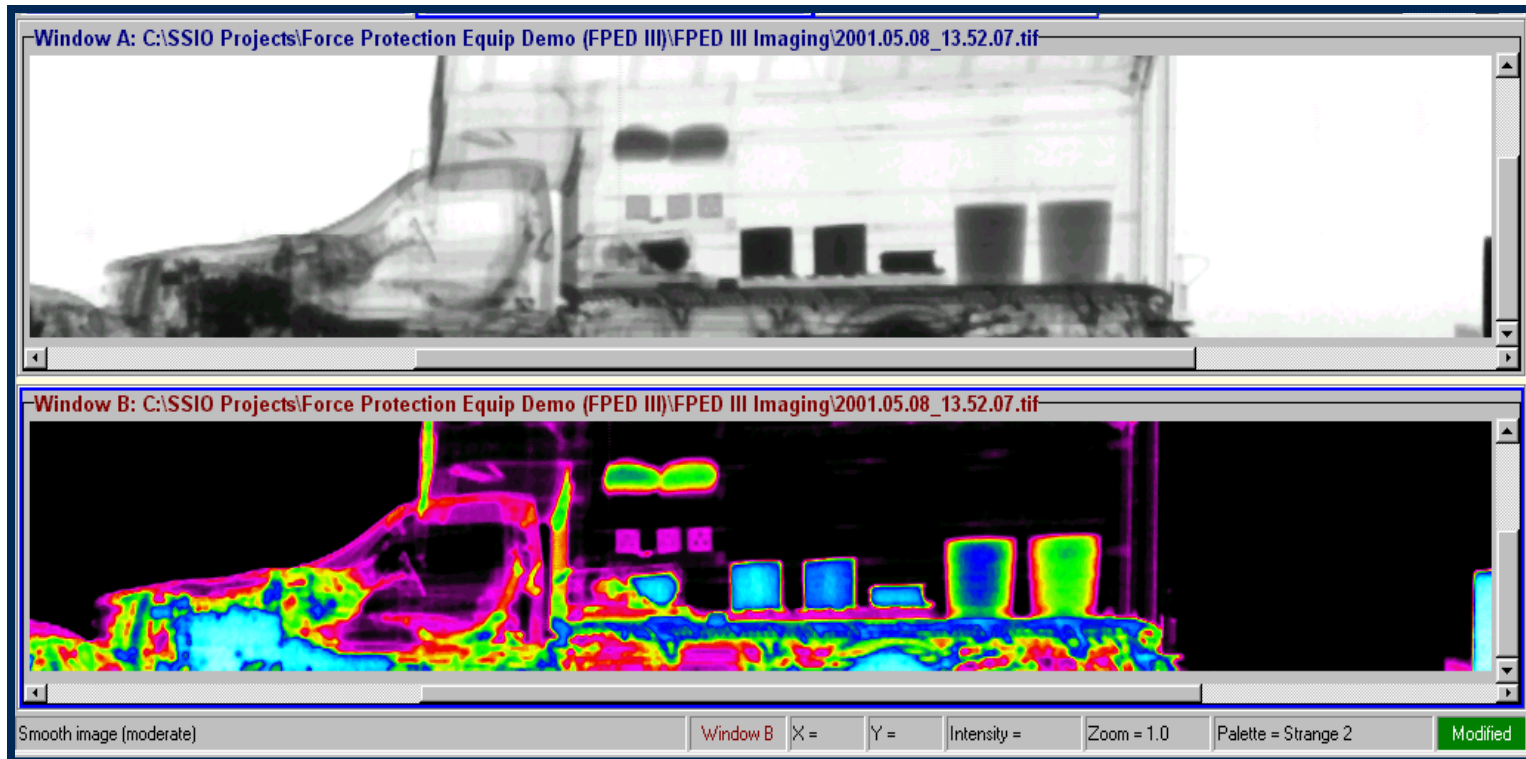
# Relocatable VACIS® Imaging System

## Product Overview



# VACIS® Imaging System

## Image Analysis



# VACIS® System Sustainment Support

## Southwest Asia

- **Training**
  - Contract includes all training required during the maintenance and sustainment support period, specifically New Equipment Training (NET) and sustainment training
  - Sustainment training is the same as NET and conducted by in-country technical trainers and field service engineers (FSEs)
- **Maintenance**
  - Sustainment includes scheduled preventive and unscheduled corrective maintenance, initial spare parts provisioning, replenishment spares, NET (operator and radiation safety), and sustainment training
  - Maintenance is performed in theater with minimum interruption of system operation
  - Technical and maintenance support is available 24 hours a day, 7 days a week from the OCONUS VACIS program manager and FSEs and backed up by the Vista organization
- **Radiation Safety**
  - In-country SAIC radiation safety officer (RSO) supports the Army RSO in monitoring compliance with applicable regulations

# Petition Request

**Amplification of Petition Information**

# CSMI Application (ML12340A385)

## Cover Letter

- CSMI stated in their license application that:
  - “CSMI is currently bidding on a solicitation for a maintenance program...”
  - “CSMI has been performing these types of services for more than 10 years as a subcontractor.”
- [https://www.fbo.gov/?s=opportunity&mode=form&id=77a217bce0f69e9d9a2207f4cad3569e&tab=core&\\_cview=0](https://www.fbo.gov/?s=opportunity&mode=form&id=77a217bce0f69e9d9a2207f4cad3569e&tab=core&_cview=0) – solicitation issued on November 26, 2012.
- CSMI was a subcontractor to SAIC on two agreements (dtd Mar '04 and Sept '04) for related services that concluded in Mar '05 and terminated in Aug '05, respectively.
- Services rendered by CSMI at the time are limited to systems that represent less than 30% of the current and future requirements called for by the solicitation.
- 70% of the remaining systems were fielded starting in mid 2007 and CSMI does not have access to proprietary SAIC information on this type of system.

# CSMI Application (ML12340A385)

## Cover Letter

- CSMI are under a continuing obligation not to reuse any SAIC proprietary information disclosed or gained.
- CSMI stated in correspondence to SAIC dtd 7/26/13 that “sealed source materials are *not* SAIC products”, when in fact all sealed sources manufactured by Vega Americas Corporation are either SAIC intellectual property and/or jointly owned and covered by a Manufacturing Agreement between SAIC and Vega.
- CSMI stated “Future training sessions for service providers will be held at OEM facilities,”, however, in correspondence to SAIC dtd 7/26/13 indicate they only intend to “retain fully trained technicians”.

# CSMI Application (ML12340A385) - Cont'd

## RSO Training, Experience, and Qualifications

- **CSMI states Roberto Bahday (later corrected to “Bhaday”) – RSO received SAIC Field Service Representative radiation safety training.**
  - Roberto Bahday (“Bhaday”) is **NOT** registered as a CSMI visitor and/or training attendee, in San Diego in January 2005 for 40 hours, CY2005, and the year before and after.
  - SAIC Field Service Training is 80 hours minimum per type of VACIS system and the Solicitation includes five (5) unique platforms/configurations requiring ~400 hrs of factory training, followed by hands-on experience in the field with SAIC technicians and engineers and annual refresher training
  - Roberto Bahday (“Bhaday”) and Michael Hartnett are employed by CAMOSA (Camiones y Motores S.A.) in Honduras. The former is a technical resource while the latter is General Manager and both unable to perform as RSO or back-up due to their location and existing responsibilities
  - Roberto Bahday (“Bhaday”) is a Foreign Person and not able to receive training on the Mil-Mobile VACIS system which is ITAR-controlled
  - Neither Roberto Bahday (“Bhaday”) or Michael Hartnett was an employee of CSMI during the dates listed on Telephone Logs (ML13028A087 and ML13028A092)

# CSMI Application (ML12340A385) - Cont'd

## Addendum to NRC Form 313 – Application for Material License

- **CSMI states Roberto Bahday (later corrected to “Bhaday”) – RSO received SAIC Field Service Representative radiation safety training.**
  - **Systems and Records were searched and Interviews conducted for Jan 2005, CY2005 and the year before and after, including:**
    - **Front Desk Receptionist for Visitor Logs and Temporary Badges**
    - **International Trade Manager (BTM) for International Visitor Forms/Visits**
    - **Corporate Security Manager for Foreign Person Visits**
    - **Training and Development Manager for Training Records**
    - **Trainers**
    - **Radiation Safety Officer (RSO)**
    - **3<sup>rd</sup> Party Dosimetry Vendor Database**
    - **Director, Client Services**
    - **General Manager**

# CSMI Application (ML12340A385) - Cont'd

- **CSMI stated in their license application that:**
  - “Manufacturer will be consulted immediately in the case of an emergency.”
  - “CSMI personnel will adhere to the strict guidelines provided by the manufacturer.”
  - “CSMI will implement and maintain procedures for conducting routine maintenance of our devices according to each manufacturer’s (or distributor’s) written recommendations and instructions.”
- **CSMI implies that a support line between the two parties exist when there is none and since the release of the solicitation they have never contacted SAIC to attempt to establish one to mitigate any emergency that could affect public health and safety, especially in hazardous locations for systems in use by the military for force-protection.**
- **The only guidelines provided by SAIC are spelled out in the Owner’s Manual which is delivered with every system. This manual describes only routine maintenance – maintenance expected to be done by end users (i.e. the U.S. Army). No guidelines for non-routine maintenance have been provided.**

# CSMI Application (ML12340A385) - Cont'd

- Owner's Manuals do NOT contain sufficient information for the end user to conduct non-routine maintenance (installation/removal of sealed sources, relocation, repair of components related to radiation safety, etc.).
- The information necessary to conduct non-routine maintenance is proprietary SAIC documentation and not available to third parties without a contract.
- Documentation and/or training on non-routine maintenance of VACIS systems is NOT part of the procurement of these systems by the Government. VACIS systems were purchased by the Army as commercial items under the GSA Schedule Program.
- The work that CSMI was bidding on is to conduct non-routine maintenance of Government owned (US Army) NII equipment. In their application for the license they claim (third clause) that they will implement and maintain procedures based on written manufacturer's recommendation.

## CSMI Application (ML12340A385) - Cont'd

- Without access to up to date SAIC proprietary information, adequately detailed procedures for non-routine maintenance would be very difficult.

# CSMI Addendum (ML13011A413) – Ancillary Personnel Radiation Safety Training

- **NUREG 1556 Volume 18 section 8.7.3 requests either a statement of compliance or a description of the radiation safety training. The CSMI description of their radiation safety program under the topic of “assessment of training” specifically states that:**
  - **“Radiation Safety Training is supervised by a RSO qualified representative of the system manufacturer.”**
- **For the VACIS systems, there is no contractual vehicle in place for the system manufacturer (SAIC) to supervise or otherwise assess this training.**

# Summary

- **The material CSMI submitted in connection with their license application states or implies that CSMI has access to SAIC Intellectual Property concerning non-routine maintenance:**
  - **“Manufacturers will be consulted immediately in cases of an emergency.” (ML12340A385)**
  - **“CSMI personnel will adhere to the strict guidelines provided by the manufacturer.” (ML12340A385)**
  - **“CSMI will implement and maintain procedures for conducting routine maintenance of our devices according to each manufacturer’s (or distributor’s) written recommendations and instructions.” (ML12340A385)**
  - **“Radiation Safety Training is supervised by a RSO qualified representative of the system manufacturer.” (ML13011A413)**
  - **“Future training sessions for service providers will be held at OEM facilities,” (ML13011A413)**
  - **Leak test “Analysis will be the responsibility of the Manufacturer or Authorized Distributor” (ML13011A435)**

## Summary – Cont'd

- Those statements that claim or imply that CSMI has access to SAIC proprietary information are false and misrepresent SAIC's involvement with CSMI proposed maintenance activities.
- CSMI does not have an open channel to any non-routine maintenance data or practices necessary for CSMI to develop procedures or keep them current with the latest recommendations of SAIC.

# Thank You

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