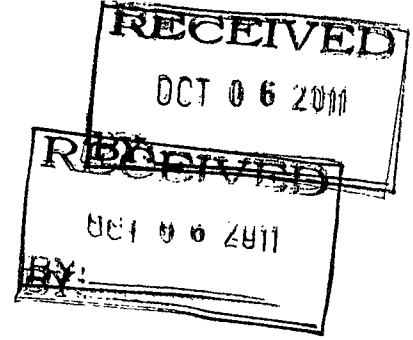


# ALSTON & BIRD LLP

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Todd M. Hess

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October 3, 2011

VIA EMAIL & U.S. MAIL

Mr. Eric Jameson  
GA Dept. of Natural Resources,  
Radioactive Materials Program  
4220 International Parkway  
Suite 100  
Atlanta, GA 30354

Email: [ejameson@dnr.state.ga.us](mailto:ejameson@dnr.state.ga.us)

Re: Official Response to Agency Inquiry Regarding use of the  
WG31B1 and WG41B1 in WEBFREX3 and WEBFREX3ES Beta  
Ray Sensor Product Lines  
Alston & Bird Reference No. 048546/387545

Dear Mr. Jameson:

Enclosed please find a memorandum regarding the above-referenced request.

Best regards.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd M. Hess', is written over a horizontal line.


Todd M. Hess

TMH:llr  
Enclosure

# ALSTON & BIRD LLP

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TO: Eric Jameson

FROM: Todd M. Hess 

DATE: October 3, 2011

RE: Official Response to Agency Inquiry Regarding use of the WG31B1 and WG41B1 in WEBFREX3 and WEBFREX3ES Beta Ray Sensor Product Lines – Alston & Bird Reference No. 048546/387545

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As Applicant has provided in section IV, subsection B of the Application for Sealed Source and Device Safety Evaluation (“Application”) filed with the Georgia Department of Natural Resources Radioactive Materials Program on November 5, 2010, the WG31B1 and WG41B1 devices are similar in all respects except that the detecting circuit of the WG41B1 is designed to have a faster response time. In no way does this implicate safety or operational issues with respect to the device or the ability of the device to maintain its integrity when subjected to conditions of normal use and likely accident conditions.

Both the WG31B1 and WG41B1 beta ray sensors are intended for use in the WEBFREX3 and WEBFREX3ES product lines. The WEBFREX designation is a trade name used by Yokogawa to identify a system for measuring thicknesses of web materials online. Yokogawa is currently marketing version 3 of the WEBFREX system. The WEBFREX3ES system is an online thickness gauge for measuring the coating weight of electrode materials used in lithium-ion batteries.

The WG31B1 and WG41B1 beta ray sensors represent the sensor component of the WEBFREX3 and WEBFREX3ES systems. In addition to the sensor, the WEBFREX3 and WEBFREX3ES systems also include an advanced human interface, controls, networking capability, etc. to allow the WEBFREX3 and WEBFREX3ES systems to be delivered to the customer as a turn-key solution.

While the functionality offered in the WEBFREX systems may vary over time, Yokogawa understands that any modification that implicates safety or operational issues with respect to the WG31B1 and WG41B1 beta ray sensors or the ability of the sensors to maintain their integrity when subjected to conditions of normal use and likely accident conditions must be authorized by, depending on the scope of the change, an amendment to an issued certificate or through the issuance of an entirely new certificate.

Please advise if these statements of fact fail to satisfy the additional information you requested in our telephone conversation of September 27, 2011.

TMH:llr

cc: Nobuya Horiguchi