CAMMENGA

CAMMENGA AND ASSOCIATES, LLC
2011 Bailey St.
Dearborn, MI 48124
Ph. (313) 914-7160

October 26, 2015

The following package is in response to the NRC's email from October 14, 2015 with Mail Control Number **586785**.

1. a.) Under Example A, the value of 9.0E-2 comes from the 90 mCi activity (90,000 uCi) multiplied by .000001 due to the rate of Tritium leakage being less than 1ppm. Under Example B, the value of 1,200 uCi/hr should actually be 2700 uCi/hr due to the 2700 Ci of total activity (2.7 E9 uCi) leaking at less than 1ppm. With all else held constant, this equals an H value of 4.8 E(-3), below the .01 rem limit of 10CFR 32.24, Column II.

b.) For Example C, there was an error in converting Ci -> uCi. The actual value of C is 63.6 uCi/ml. Using this C value in the H formula, the final value equals 3.2E(-2), below the .5 rem limit of 10CFR 32.24, Column III.

c.) For Example D, there was an error in converting Ci -> uCi. The actual value of C is 6.6 uCi/ml. Using this C value in the H formula, the final value equals 3.3E(-3), far below the .5 rem limit of 10 CFR 32.24, Column III.

2. The materials we wish to use are as follows:

- Carbon Steel Alloy with a Rockwell hardness value range in between 54-60.
- Stainless Steel Alloy with a Rockwell hardness value range in between 75-88.
- Titanium Alloy with a Rockwell hardness value range in between 75-80.

These materials listed above ensure the devices will maintain their integrity during normal and accident conditions. We know this to be true because the hardness levels of all materials above are greater than that of the prototype units tested.

3. Both the Dow Corning 732 and 734 are used in these devices. As such, there are no changes to the gluing process.

4. The minimum amount of material around the sources will remain unchanged. This minimum amount of material is .30 mm.

5. Cammenga & Associates would like to remove pad printing as a labeling method for this device.

Best Regards,

Christopher J. Karchon
Director of Strategic Operations