



CONVERSATION RECORD

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Doug Beek	DATE OF CONTACT 09/30/2015	TYPE OF CONVERSATION	
E-MAIL ADDRESS dbeek@irsc-inc.com	TELEPHONE NUMBER (978) 703-4416	<input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE	<input type="checkbox"/> INCOMING <input type="checkbox"/> OUTGOING
ORGANIZATION AIS gauging	DOCKET NUMBER(S) 030-34598		
LICENSE NUMBER(S) 13-32049-01	CONTROL NUMBER(S) 588180		

SUBJECT  
Application for an amendment to authorize R&D to develop fixed gauges, and provide non-routine service of fixed gauges.

SUMMARY AND ACTION REQUIRED (IF ANY)  
1. Proposed Research and Development

a. Confirm that sources will not be opened or compromised in any way during handling, or while they are being used as authorized on the license.

b. Since you will be handling sources with tools when removing them from storage, inserting them into source holders, removing them from source holders, and placing them back into storage, we recommend that you conduct a leak check at a frequency that exceeds what is recommended in the sealed source and device registry. For example, in the interest of safety, a leak test should be performed each time after the sources are placed in the source holder, and then each time after they are removed from source holders before they are placed back into storage in order to verify that their integrity has not been compromised.

c. In order to effectively assess the extremity dose to workers who will be handling the sources, please commit to assigning extremity dosimeters for both hands to all individuals who will be handling a sealed source.

d. Develop and submit detailed procedures that handlers will implement when sources are removed from shielded containers, placed in and removed from source holders, and placed back into their shielded containers. Include all radiation safety equipment that will be used during this process.

e. Develop and submit a procedure for dealing with a source that has been identified to be leaking. The procedure needs to be comprehensive in that it needs to address not only identifying the source that is leaking and provisions for securing it and preventing the spread of contamination, but also the need to evaluate facilities, equipment, and staff for contamination, etc. Include radiation safety related equipment and protective clothing that will be used by staff.

f. In the event that a sealed source is breached during the handling and manipulating of sources while conducting R&D activities, you must be able to assess the potential intake of a radionuclide and/or skin dose, as applicable. Therefore, please develop and submit a bioassay program.

g. The use of remote handling tools is essential in utilizing distance to keep exposure ALARA. Please describe the size and length of the handling tools that will be used.

h. Please confirm that only Mr. Young and Mr. Wrightsman will be handling the sealed sources. If individuals other than these two will be handling sources, you must specify whether or not this will be done under direct supervision of Mr. Young or Mr. Wrightsman, and describe the training that these individuals will receive.

i. References to a radiation safety manual were made in your application. Please submit a copy of the manual for our review and incorporation into the license.

### CONVERSATION RECORD (continued)

LICENSE NUMBER(S)

CONTROL NUMBER(S)

13-32049-01

588180

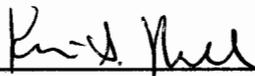
SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

- FA*
- j. Information in Tabs H through Z of your application was missing. Please submit this information for our review.
  - k. Submit a description of the radiation safety training program, including topics covered, groups of workers, assessment of training, qualifications of instructors, and the method and frequency of training for individuals (occupational workers and ancillary staff) working in or frequenting restricted areas.
  - l. Develop and submit procedures for material receipt and accountability. Commit to conducting a physical inventory at intervals not to exceed 6 months, to account for all sealed sources received and possessed under the license.
  - m. Develop and submit a program for managing radioactive waste. Reference Appendix T to NUREG-1556, volume 7 for an acceptable procedure.
  - n. Submit a detailed description of the practical experience/training that Mr. Young and Mr. Wrightsman received in handling sealed sources.
2. Non-routine maintenance of gauges
- a. Provide a comprehensive list of all non-routine services that you will provide to your clients. Confirm that these services will be limited to the devices identified in your service manuals.
  - b. Individuals authorized to performed non-routine maintenance will be listed on your license. Therefore, please provide a list of individuals who you would like to be listed on the license and for each person, describe the services that they will be performing. Also, for each service that they will perform, describe the training that they have received in performing each service.
  - c. Describe any services on devices that will be performed involving the electronics which could impact radiological safety of the devices such as shutter mechanisms, shutter controls, shielding, source movement mechanisms, etc.
  - d. In your application you stated that parts or materials other than those specified by the gauge manufacturer may be used if they have been evaluated to ensure that they will not degrade the engineering safety analysis. Describe how and by whom these evaluations will be conducted, and describe how you will assess an evaluation in order to assure that it was effective and accurate.
  - e. Describe the content of the initial and annual refresher training in item 8 of service manual volume 1 of your application. Confirm that this training is separate and independent of specific device training.
  - f. Submit the make and model numbers, and radiation detected for all survey meters that will be available for, and used by authorized users who will be servicing gauges.

NAME OF PERSON DOCUMENTING CONVERSATION

Kevin Null

SIGNATURE



DATE OF SIGNATURE

09/30/2015