

From: [Doug Broadwell](#)
To: [Reber, Eric](#)
Cc: [Tony Harris](#)
Subject: [External_Sender] Docket # 030-38916
Date: Wednesday, July 13, 2016 1:23:40 PM
Attachments: [Cover Letter RAI of 070116.pdf](#)
[cseco lic for amendment to ca.pdf](#)
[CSECO RAI.pdf](#)
[K9B English USNRC Body 071116 RAI Pages.pdf](#)
[K9G English USNRC Body 071116 RAI Pages.pdf](#)

Hello Mr. Reber,

Attached is our response to your Request for Additional Information of 7/1/16. A hard copy is being mailed to:

U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Division of Material Safety, State, Tribal, and Rulemaking Programs
Materials Safety Licensing Branch
Mail Stop T-8E18
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

Attn: Mr. Eric H. Reber

Please let me know if this is incorrect or if you require more information.

Regards,
Doug Broadwell

Doug Broadwell
Operations Manager
510-864-8010 x 111
875A Island Dr. Suite 356
Alameda CA 94502





Campbell/Harris
SECURITY EQUIPMENT COMPANY

875-A Island Drive #356, Alameda, CA 94502-6768 USA Ph: 510-864-8010 Fx: 510-864-8013 info@cseco.com

USNRC

Attn: Eric H. Reber

Materials Safety Licensing Branch

Division of Material Safety, State, Tribal and Rulemaking Programs

Office of Nuclear Material Safety and Safeguards.

Subject: Re-application for Device Evaluation

Dear Mr. Reber:

Enclosed is the response to the Request for Additional Information ("RAI") of 7/1/16 Docket Number 030-38916. The request is being issued to the state of California for amendment of our Radioactive Material License 4147-01; item 9.E. on page 1 has been modified to include distribution to license-exempt persons under 10 CFR 30.22

Regards,

A handwritten signature in black ink that reads "Doug Broadwell".

7/13/16

Doug Broadwell, Operations Manager.

CSECO
ATTN: Doug Broadwell
Operations Manager
875A Island Dr. #356
Alameda, CA 94502

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING CSECO EXEMPT
DISTRIBUTION LICENSE APPLICATION AND SEALED SOURCE AND DEVICE
REGISTRATION CERTIFICATE APPLICATION

Dear Mr. Broadwell:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your response letter dated June 15, 2016, which provided additional information in response to the NRC's letter dated May 19, 2016. The staff has determined that additional information is needed. In order to continue with our review, please address the following issues:

1. The regulations in 10 CFR 32.30(a) state, in part, that an application for a specific license to initially transfer for sale or distribution devices containing byproduct material for use under 10 CFR 30.22 will be approved if the applicant satisfies the general requirements of 10 CFR 30.33. The regulation in 10 CFR 30.33(a)(2) provides one of the conditions for the approval of a specific license: the applicant's proposed equipment and facilities are adequate to protect health and minimize danger to life or property. The regulation in 10 CFR 30.33(a)(3) provides another: the applicant is qualified by training and experience to use the material for the purpose requested in such manner as to protect health and minimize danger to life or property. However, according to 10 CFR 32.30(a), the requirements in 10 CFR 30.33(a)(2) and (3) do not apply to "an application for a license to transfer byproduct material in such industrial devices manufactured, processed, or produced under a license issued by an Agreement State."

In the NRC's letter dated May 19, 2016, you were requested to provide a copy of your current State of California license that authorizes the manufacture, processing, or production of the K9 series of portable density gauges that will be distributed for use by license-exempt persons under 10 CFR 30.22.

In response, you provided a copy of your State of California license that authorizes the distribution of generally licensed devices, i.e., State of California License No. 6156-01GL. This license is not applicable to the distribution of products to license-exempt persons and therefore does not and could not fulfil the requirement in 10 CFR 32.30(a) for "a license to transfer byproduct material in such industrial devices manufactured, processed, or produced under a license issued by an Agreement State."

The NRC has previously reviewed your State of California license that authorizes various activities related to gauges, i.e., State of California License No. 4147-01. This is the license that could be amended to satisfy the requirements in 10 CFR 30.33(a)(2) and (3). To satisfy the requirements in 10 CFR 30.33(a)(2) and (3), you should amend License No. 4147-01 so that it authorizes the manufacture, processing, or production of the K9 series of portable density gauges that will be distributed for use by license-exempt persons under 10 CFR 30.22 or the regulations of an Agreement State, and provide a copy of the amended license to the NRC.

2. The following items concern the review of your application for a sealed source and device registration certificate:
 - a. Please provide a non-proprietary version of the drawing “K910B – External”, including the overall dimensions of the K9 Series devices so that it may be included as an attachment to CSECO’s registration certificate.
 - b. On page 19 of the K9B and K9G operations manuals under “Electronic Maintenance” the sample label references “10 lci” this appears to be a typographical error as the activity should be 10 μ Ci. Please provide corrected pages each of the user manuals.
 - c. On pages 26 and 27 of the K9B and K9G operations manuals under “EMERGENCY INVOLVING OBVIOUS DAMAGE TO THE BUSTER”, “TRANSFER OF THE BUSTER TO A DIFFERENT USER”, and “DISPOSAL” it states “Note: if the user is a “Specific Licensee”, typically an institution that is licensed for other radioactive sources/devices then the user is subject to 10 CFR§20”. Please note that the statement is inaccurate and could lead to confusion. The devices used under 10 CFR 30.22 are not subject to the requirements in 10 CFR Part 20, even if the user possess a specific license. Please delete the statement and provide corrected pages for the user manuals.

Any correspondence regarding your application should reference the control number specified below. Please submit the requested information within 30 days of the date of this email. If we have not received complete information within 30 days of the date of this letter, we will consider your application as having been abandoned by you. This is without prejudice to the submission of a complete application.

Please be aware that upon your request, proprietary information submitted to the NRC may be withheld from public disclosure. To do this, you must follow the procedures in Title 10 of *Code of Federal Regulations* (10 CFR) 2.390(b) including requesting withholding at the time the information is submitted and complying with the document marking and affidavit requirements set forth in 10 CFR 2.390(b)(1).

In accordance with 10 CFR 2.390 of the NRC’s “Agency Rules of Practice and Procedure,” a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC’s Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If you have questions regarding your exempt distribution license application, please contact me at (301) 415-5608, or by email at Eric.Reber@nrc.gov. For questions regarding your application for a Sealed Source and Device registration certificate, please contact Tomas Herrera at (301) 415-7138, or by email at Tomas.Herrera@nrc.gov.

Sincerely,

Eric H. Reber
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal,
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

Docket No. 030-38916
Mail Control No. 590618

RADIOACTIVE MATERIAL LICENSE

Pursuant to the California Code of Regulations, Division 1, Title 17, Chapter 5, Subchapter 4, Group 2, Licensing of Radioactive Material, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, use, possess, transfer, or dispose of radioactive material listed below; and to use such radioactive material for the purpose(s) and at the places(s) designated below. This license is subject to all applicable rules, regulations, and orders of the California Department of Public Health now or hereafter in effect and to any standard or specific condition specified in this license.

1. Licensee	Campbell/ Harris Security Equipment Company	3. License Number	4147-01	Amendment Number:	24
2. Address	875-A Island Drive #356 Alameda, CA 94502-6768	4. Expiration date	February 17, 2019	(5)	
Attention:	Anthony Harris Radiation Safety Officer	5. Inspection agency	Radiologic Health Branch North		

License Number 4147-01 is hereby amended as follows:

6. Nuclide	7. Form	8. Possession Limit
A. Cobalt-57	A. Sealed source (New England Nuclear LE 316)	A. One source not to exceed 1 millicurie.
B. Cesium-137	B. Sealed source (Amersham CDC-700)	B. One source not to exceed 1 millicurie.
C. Americium-241	C. Sealed source (Amersham AMC.02)	C. One source not to exceed 1 millicurie.
D. Cobalt-60	D. Sealed sources, manufactured, labeled, packaged, and distributed in accordance with a specific license issued to the manufacturer by the U.S. Nuclear Regulatory Commission or an Agreement State.	D. One source not to exceed 1 millicurie.
E. Barium-133	E. Sealed sources (Amersham BOC 700 Dupont NER-474 or IPL Models 225, GFS and A3902)	E. 200 sources not to exceed 1 millicurie each.
F. Barium-133	F. Sealed sources, manufactured and distributed in accordance with a specific license issued to the manufacturer by the U.S. Nuclear Regulatory Commission or an Agreement State.	F. 50 sources not to exceed 1 millicurie each.
G. Cobalt-57	G. Sealed sources, manufactured and distributed in accordance with a specific license issued to the manufacturer by the U.S. Nuclear Regulatory Commission or an Agreement State.	G. 50 sources not to exceed 1 millicurie each.

9. Authorized Use

A.-D. To be used as components in the development of prototype gauges.

E. To be used as components for the manufacture, and development of prototype gauges, demonstration, training, maintenance, and distribution of K series gauges to specific licensees of the NRC or Agreement States.

To be used as components for the manufacture, processing, or production of the K9 series of portable density gauges that will be distributed for use by license-exempt persons under 10 CFR 30.22 or the regulations of an Agreement State.

F&G. To be used as components of gauges for storage and disposal.

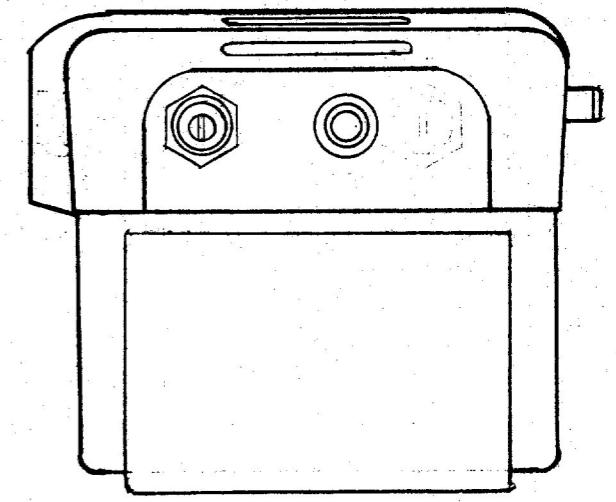
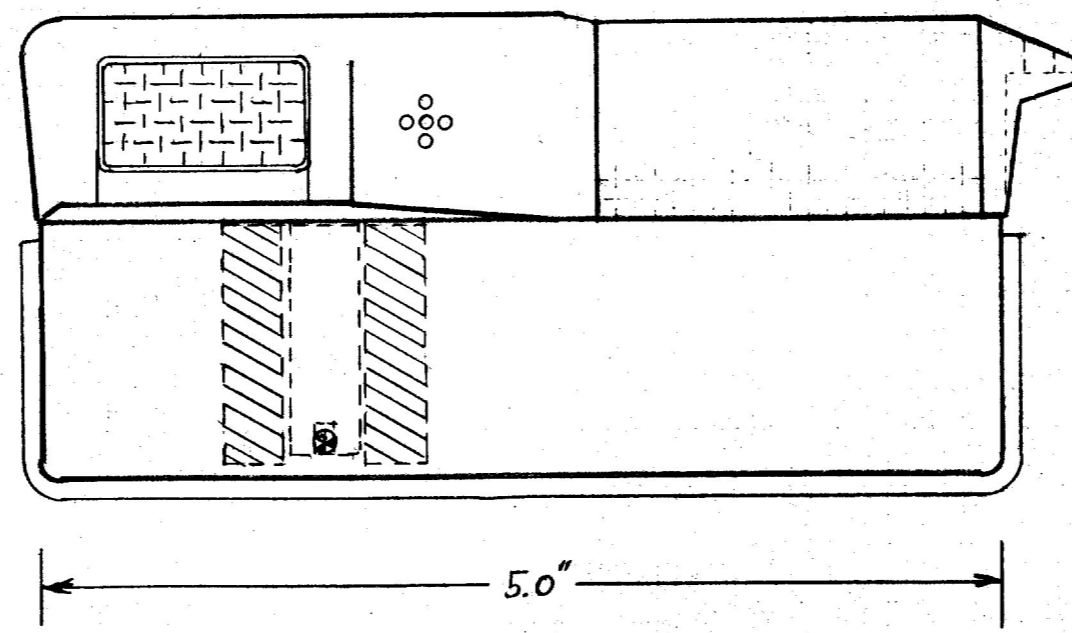
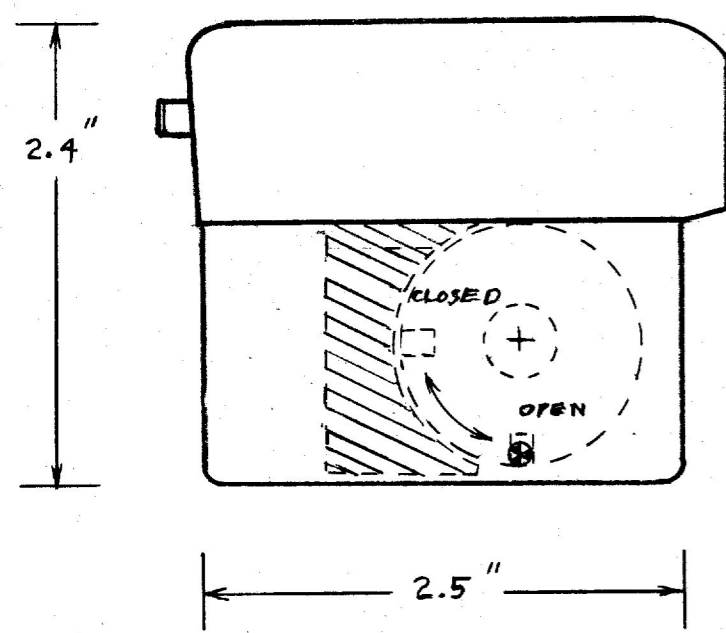
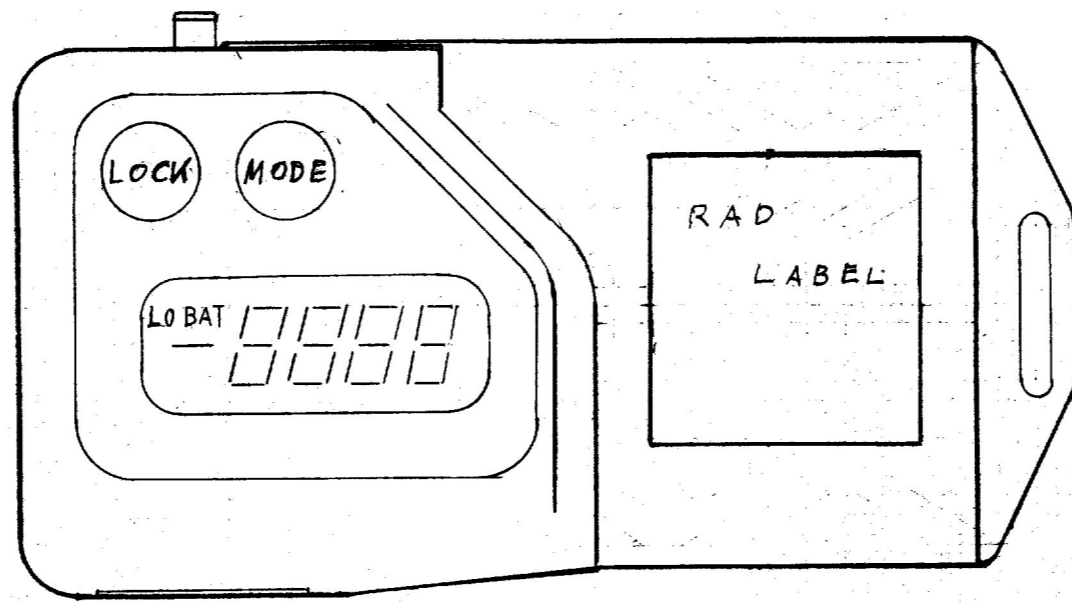
LICENSE CONDITIONS

10. Radioactive material shall be used only at the following locations:

(a) 2209 Harbor Bay Pkwy, Alameda, CA

(b) Temporary job sites of the licensee in areas not under exclusive federal jurisdiction throughout the State of California.

A	9 JAN 90	REDRAW - ORIG	Ⓢ
B	17 SEP 90	CHG PATTERN ON PUSH BUTTON	Ⓢ
C	30 OCT 91	REMOVE PATTERN, DEC CASTING HT	Ⓢ



CSECO Campbell Security Equipment

SCALE 1-1 REF

DATE 10 JAN 90

K910 B - EXTERNAL

DWG 1 RPK9-000-2

CAUTION
RADIOACTIVE MATERIAL
10 uCi (0.37 Mbq) or less, BA133
SEALED SOURCE UNDER THIS LABEL

FACTORY SERVICE ONLY
ON THIS COMPONENT

LABEL REMOVAL PROHIBITED

8.4 Diagnostic Check of Electronics

1. **First**, hold down the MODE and DISPLAY LOCK buttons simultaneously.
2. **Then**, press the trigger and hold it. **Now**, release the MODE and DISPLAY LOCK buttons.

The K910B will cycle through an automatic diagnostic check, testing all segments and combinations of display readings. Observe the display for an error in the sequence.

Because the Buster is an Exemptly licensed device and is lead-free, there are no special requirements for disposal of a damaged unit. However, prudence dictates that All of the pieces of the damaged Busters should be disposed of responsibly as normal garbage, and remove or deface all radiation symbols from the unit.

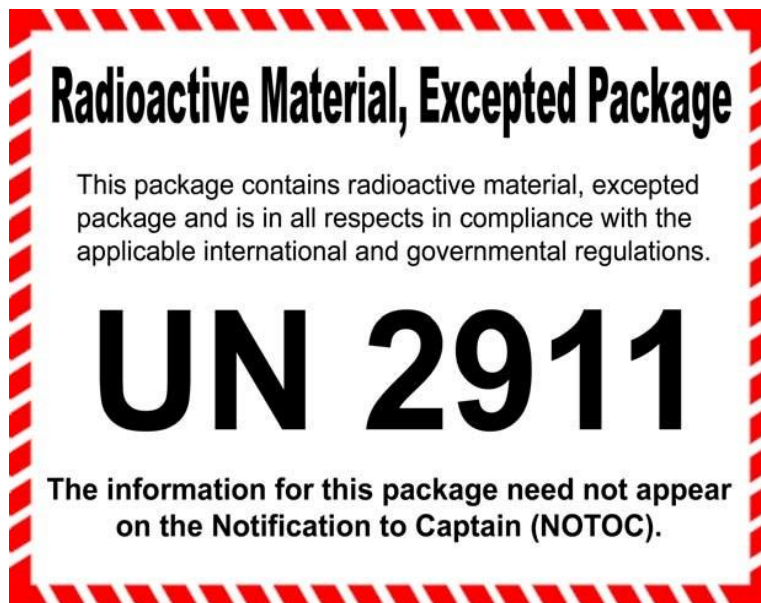
As of mid-2016 the Buster has been in the field for over 21 years, no Buster has suffered damage to the radioactive source from any cause.

4. TRANSPORTATION

U. S. DOT Regulations, **TITLE 49, Parts 17 through 173.421** govern the transportation of radioactive materials on U. S. public access ways. In addition, IATA Dangerous Goods Regulations, govern transport of radioactive materials on aircraft.

The CSECO K910B Buster, when packed in its plastic transport case, meets the special requirements of **49 CFR 173.421** for "Excepted Radioactive Material" and does not require radiation symbol labels on the exterior of the transport case. This is because of the combination of small source, efficient shielding, and design of the case.

This device can be transported on common carriers without radiation symbol labels on the outside of the package. If 3 or less Busters are being shipped in a consignment, no other labeling is required. If 4 or more Busters are in a consignment for air shipment, the IATA rules (which almost all airlines follow) requires the following *Certification Label* is attached to the transport case:



There are these labels on the last page of this manual that can be cut out and used for shipping.

Note that ground transportation of 4 or more units does not require this label.

The case always should be locked or the package sealed during transportation to prevent unauthorized entry to the device.

5. **STORAGE**

Contraband detectors should be stored in their shipping cases in a locked area with key access only by the authorized operators

6. **TRANSFER OF THE BUSTER TO A DIFFERENT USER**

As an Exemptly licensed device, there are no special requirements to transfer the Buster to a different user or agency.

7. **DISPOSAL**

As an Exemptly licensed device, the requirements for disposal are minimal: remove or deface all external radiation symbols and dispose of as normal waste. If a significant number of Busters are to be retired we strongly encourage you to ship them back to the factory for disposal

8. **SERVICE AND MAINTENANCE - SHUTTER MECHANISM**

See Paragraph 8 MAINTENANCE in the Operating Section for general service information.

The Source/Shutter mechanism is NOT field repairable and the Buster MUST be returned to the factory or to a factory authorized repair station for service. The Source/Shutter mechanism is identified by the following internal label:

CAUTION
RADIOACTIVE MATERIAL
10 μCi (0.37 Mbq) or less, BA133
SEALED SOURCE UNDER THIS LABEL
FACTORY SERVICE ONLY
ON THIS COMPONENT
LABEL REMOVAL PROHIBITED

8.4 Diagnostic Check of Electronics

1. **First**, hold down the MODE and DISPLAY LOCK buttons simultaneously.
2. **Then**, press the trigger and hold it. **Now**, release the MODE and DISPLAY LOCK buttons.

The K910G will cycle through an automatic diagnostic check, testing all segments and combinations of display readings. Observe the display for an error in the sequence.

Because the Buster is an Exemptly licensed device and is lead-free, there are no special requirements for disposal of a damaged unit. However, prudence dictates that All of the pieces of the damaged Busters should be disposed of responsibly as normal garbage, and remove or deface all radiation symbols from the unit.

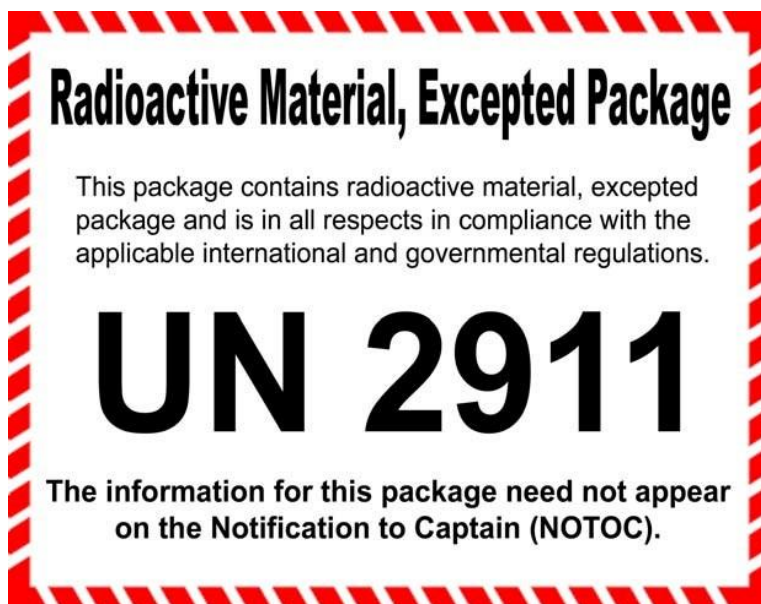
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CAUTION
RADIOACTIVE MATERIAL
10 uCi (0.37 Mbq) or less, BA133
SEALED SOURCE UNDER THIS LABEL

FACTORY SERVICE ONLY
ON THIS COMPONENT

LABEL REMOVAL PROHIBITED

K9 SN: _____

Scn SN: _____

_____ uCi _____ Mbq

ASSAY Date: _____

Please note that the radioactive source in standard production K9G Busters is only 7.5 uCi (277.5kBq) in size.