From: Brand, Eric
To: Jones, Andrea
Subject: [External_Sender] RE: RE: Re: XCOM license Nos 1325 and 1326
Date: Thursday, March 21, 2019 4:35:19 PM

Hello Andrea,

I've been away from the office and have not submitted the amended application for export.
This will be completed and mailed to the NRC office by tomorrow 3/22/19 (XCOM-1326).

Mirion initiated a Corrective Action Request (CAR) in accordance with our internal Quality Assurance Program.
The internal CAR process will be used to document the following:

1) Cause of the Deficiency
2) Corrective Action
3) Preventative Action to Prevent Recurrence.

The response to the internal CAR has been assigned a due date of 4/14/19 and is not complete.
I anticipate the response will be received before 4/14/19.

Mirion internal discussions are leaning towards creating a robust checklist to document the export requirement decisions for each customer order.
Mirion currently has an order entry process with documented Quality and Engineering reviews. The export requirements are considered during the review but not specifically documented.
The creation of an export requirements checklist would be completed at the point of order entry.
The checklist would be required for every customer order entered into our system and document the specific decisions made for compliance to export requirements.
When required by regulation, the need for a specific export license would be identified and documented on the checklist.
Items would not be allowed to ship until the request for a specific export license has been approved and received from the regulator.

If you have further questions or comments please feel free to contact me.

Thank You,

Eric P. Brand
Quality Manager

MIRION TECHNOLOGIES

Mirion Technologies (IST) Corporation
Sensing Systems Division
315 Daniel Zenker Drive
300 IST Center
Horseheads, NY 14845

(607)-562-4414 (Office)
(607)-562-4482 (Fax)

EBrand@Mirion-ssd.com
www.Mirion.com

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From: Jones, Andrea <Andrea.Jones2@nrc.gov>
Sent: Thursday, March 21, 2019 12:37 PM
To: Brand, Eric <ebrand@mirion-ssd.com>
Subject: RE: RE: Re: XCOM license Nos 1325 and 1326

Hello Mr. Brand, have you had an opportunity to complete the amended copy of your XCOM application? We will need this to document your corrective actions for the November export of the Fission Chamber to the Netherlands. Also, are there any other corrective actions that you have performed in order to prevent the recurrence of exporting additional equipment or materials without first obtaining a license?

From: Brand, Eric [mailto:ebrand@mirion-ssd.com]
Sent: Wednesday, March 13, 2019 8:34 AM
To: Jones, Andrea <Andrea.Jones2@nrc.gov>
Subject: [External_Sender] RE: Re: XCOM license Nos 1325 and 1326

Hello Andrea,

I've reviewed our records for the transactions with NRG Petten and some of the information provided over the phone was inaccurate.
The Mirion part Numbers for PO Lines #1 & #2 are very similar and by mistake, I reported there were two fission chambers which was not correct.
There is only one fission chamber, Mirion model number WL-6376A.
On the application for NRC Export form 7, I listed a quantity of (2) Fission Chambers which is not correct.
Mirion needs to amend this application and apply for the export of only (1) Fission Chamber.

The Customer Purchase Order was for (1) of each of the items listed below.

The shipping transactions from Mirion to NRG Petten are as follows:

Customer Purchase Order NRG-P4187490 (Netherlands).

1) PO Line Item #1,
   Quantity 1
   Mirion Part Number WL-23084, S/N 184307
   Compensated Ion Chamber
   Shipped to NRG Petten October, 2018
   General Export License

2) PO Line Item #2
   Quantity 1
   Mirion Part Number WL-6937A, S/N 184338
   Uncompensated Ion Chamber
   Shipped to NRG Petten October, 2018
   General Export License

3) PO Line Item #3
   Quantity 1
   Mirion Part Number WL-6376A, S/N 184904
   Fission Chamber (contains 1.68 gm U-235)
   Shipped to NRG Petten November, 2018
   Shipment Transaction of U235 Reported to NMMSS on NRC Form-741 submitted 11/30/18
   General Export License

   Refused at point of entry – Hazardous Material
   Received back at Mirion 1/18/19
   Receipt Transaction of U235 Reported to NMMSS on NRC Form-741 submitted 1/18/19.
   The Fission Chamber has not been re-exported at this time.

   Because of the return, Mirion reviewed the shipping requirements.
   In review of transaction details, Mirion recognized these required a specific export license due to the reactor capacity (above 5 MW Thermal).
   Application for NRC Specific License submitted 2/27/19 for the Fission Chamber to be Re-Exported.

All three line items are for Neutron Radiation Detectors (Ex-Core Detectors).
The three various models above each have a different range of neutron sensitivity.
All three model numbers are considered to be especially designed and prepared for a nuclear reactor

Customer Purchase Order NRG-P4193470 (Netherlands).

1) PO Line Item #1,
   Quantity 2
   Mirion Part Number WL-23084
   Compensated Ion Chamber
   Manufacturing is in process, no shipments to date.
   Application for NRC Specific License submitted 1/23/19 (XCOM 1326).

The WL-23084 Compensated Ion Chamber (Ex-Core Detector) is considered to be especially designed and prepared for a nuclear reactor

I hope this provides clarity for your questions. My apologies for the misinformation provided over the phone.
If I may be of further assistance please feel free to contact me.

Thank You,

Eric P. Brand
Quality Manager

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From: Jones, Andrea <Andrea.Jones2@nrc.gov>
Sent: Tuesday, March 12, 2019 10:56 AM
To: Brand, Eric <ebrand@mirion-ssd.com>
Subject: RE: Re: XCOM license Nos 1325 and 1326

Hi Eric. I sent the message yesterday prior to you and I speaking yesterday.

Just to follow up, you were going to confirm how many detectors were exported to Petten RTR.

Also, please confirm how many you would need a specific license for.

We will still need to process your application for the detectors, although one or more(?) was sent already, according to NMMSS.

A specific license under 10 CFR Part 110.26(c) was required for the export.

Also, for the fission chambers requested for Petten, is this a product that can be used in any other industrial activity. Or is it especially designed or prepared for a nuclear reactor.

From: Brand, Eric [mailto:ebrand@mirion-ssd.com]
Sent: Tuesday, March 12, 2019 10:38 AM
To: Jones, Andrea <Andrea.Jones2@nrc.gov>
Subject: [External_Sender] Re: XCOM license Nos 1325 and 1326

Good morning Andrea,

I'm out of the office this morning performing a supplier audit but I will accept your call.
Please contact my cell number at (607)-378-8152.

Thank You
Eric

Sent from my iPhone

On Mar 12, 2019, at 9:44 AM, Jones, Andrea <Andrea.Jones2@nrc.gov> wrote:

> Hello, Mr. Brand can you please give me a phone call, as soon as possible, regarding both your license applications you have submitted for review. One for Argentina and the other for The Netherlands. I can be reached at 301-415-0059, through Thursday, March 14th.
>
> Andrea R. Jones
> Sr. Licensing Officer/Office of International Programs
> Location: US NRC/Region II/Office 1469
> 404-997-4443