

[External_Sender] RE: RE: Re: XCOM license Nos 1325 and 1326

Brand, Eric <ebrand@mirion-ssd.com>

Wed 4/3/2019 12:24 PM

To: Jones, Andrea <Andrea.Jones2@nrc.gov>

Hello Andrea,

The plan is to use this checklist on a go forward basis.

As preventative action, this will be part of our documented Quality Assurance Program and will be instituted for all customer orders going forward.

If you have additional concerns or comments please let me know.

Best regards,

Eric

From: Jones, Andrea <Andrea.Jones2@nrc.gov>

Sent: Wednesday, April 3, 2019 4:05 PM

To: Brand, Eric <ebrand@mirion-ssd.com>

Subject: RE: RE: Re: XCOM license Nos 1325 and 1326

Hi Eric,

Just a follow-up question for your consideration, how long to you plan on using this checklist for Mirion?

From: Brand, Eric [<mailto:ebrand@mirion-ssd.com>]

Sent: Wednesday, April 03, 2019 2:29 PM

To: Jones, Andrea <Andrea.Jones2@nrc.gov>

Subject: [External_Sender] RE: Re: XCOM license Nos 1325 and 1326

Hello Andrea,

I was working on the initial version of the Mirion Order Entry PO Review Checklist.

I've attached a copy of the Export Compliance Review section for your information.

This is to provide some visibility to our internal Corrective Action taken.

The form will be used on a go forward basis and will more thoroughly document the customer order review process.

Please let me know if you have any questions or comments.

Thank You,

Eric P. Brand

Quality Manager



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From: Jones, Andrea <Andrea.Jones2@nrc.gov>
Sent: Wednesday, April 3, 2019 10:38 AM
To: Brand, Eric <ebrand@mirion-ssd.com>
Subject: RE: Re: XCOM license Nos 1325 and 1326

Hi Eric, did you have a update on the checklist? That you can share?

From: Jones, Andrea
Sent: Wednesday, March 27, 2019 11:51 AM
To: Brand, Eric <ebrand@mirion-ssd.com>
Subject: RE: Re: XCOM license Nos 1325 and 1326

Now if you have time. I'm at 404-997-4443

From: Brand, Eric [<mailto:ebrand@mirion-ssd.com>]
Sent: Wednesday, March 27, 2019 11:50 AM
To: Jones, Andrea <Andrea.Jones2@nrc.gov>
Subject: [External_Sender] Re: XCOM license Nos 1325 and 1326

Hello Andrea,

Yes, what time will work for you to have a discussion?

Thank You,
Eric

Sent from my iPhone

On Mar 27, 2019, at 10:05 AM, Jones, Andrea <Andrea.Jones2@nrc.gov> wrote:

Hi Eric, do you have some time today, to discuss your email further?

From: Brand, Eric [<mailto:ebrand@mirion-ssd.com>]
Sent: Thursday, March 21, 2019 4:35 PM
To: Jones, Andrea <Andrea.Jones2@nrc.gov>
Subject: [External_Sender] RE: RE: Re: XCOM license Nos 1325 and 1326

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

<image001.jpg>

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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

<image001.jpg>

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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