

Tran, Frank

From: Tran, Frank
Sent: Monday, June 03, 2019 12:15 PM
To: 'Steven Corley'
Cc: 'Pelke, Patricia (Patricia.Pelke@nrc.gov)'; McCraw, Aaron
Subject: RE: Instadose
Attachments: RIS-2018-04 and EGM-18-001.pdf

Dear Mr. Corley:

Based on Section 2 of the renewal application dated January 19, 2011 which was tied down in your license, you have committed that a radiographic person will wear a film badge or TLD, a pocket dosimeter, an alarm ratemeter, and a survey meter before performing any radiographic operations. If you would like to use different radiation monitoring equipment, you should review the NRC Regulatory Issue Summary (RIS) 2018-04 with the Enforcement Guidance Memorandum (EGM) 18-001 which discussed the NRC positions regarding the alternative dosimeter (e.g., Instadose). For your reference, the document mentioned above are attached. Please pay attention to the guidance in "Actions" in the EGM.

If you would like to deviate from the 10 CFR 34, Subpart D and the EGM-18-001 regarding the radiation monitoring equipment requirement for good reasons, you must submit an exemption request in accordance with 10 CFR 30.11 and the guidance in Section 10 of the NUREG-1556, Volume 2, Revision 2. However, it is unlikely the NRC will review and approve such requests because they may reduce the effectiveness in monitoring the radiation exposure to the radiographers and assistant radiographers and members of the public and against the ALARA concept (defense in depth).

Best regards,

Frank Tran

From: Steven Corley [mailto:SCorley@pitinc.com]
Sent: Monday, June 03, 2019 8:26 AM
To: Tran, Frank <Frank.Tran@nrc.gov>
Subject: [External_Sender] Instadose

Frank,

Premium inspection is wanting to swap from Landauer TLD's to Mirion Instadose badges. Before doing so we will have to update or O&E procedures and do some formal training with our employees. From a compliance stand point with the NRC is there anything else we will need to do to satisfy the NRC before moving forward with this plan?

Best Regards,

Steven Corley
NDT Operations Manager/RSO

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