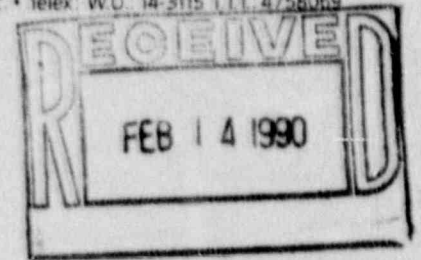


UPA TECHNOLOGY
DIVISION

SUBJECT: Distribution of Generally Licensed Radioisotope Sources

Calendar Quarter Ending: 12/31/89

As required by our Radioactive Materials License (New York State) No. (GL) 1414-0921 and by State of New York Industrial Code Rule 38, Table 3, item (b) (and by equivalent U.S.N.R.C. regulations, Title 10, Part 31, par. 31.5), we are submitting the accompanying names of customers in your area of jurisdiction to whom we shipped radioisotope sources and probes during the last calendar quarter. All of these sources are sold for use with the Micro-derm beta-backscatter thickness gauges.

In addition to the shipping date, source model number and serial number, the isotope contained in the source is indicated by element notation only. The specific isotope and the amount of it included are listed here:

| <u>Element</u> | <u>Isotope</u> | <u>Maximum Amount, Microcuries, Mega-Becquerels</u> |
|----------------|--------------------------|---|
| Pm | Promethium-147 | Less than 75, 2.775 |
| Tl | Thallium-204 | Less than 100, 3.70 |
| Sr | Strontium-90, Yttrium-90 | Less than 25, .925 |

Very truly yours,

Marty Schreck
Assistant Radiation Safety Officer
Radiation Lab Supervisor

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60 OAK DRIVE - VEECO INSTRUMENTS - SYOSSET, NY 11791
UPA TECHNOLOGY DIVISION
516-364-1080

STATE: Texas

| CUSTOMER, ADDRESS, NAME | ISOTOPE | MODEL # | S/N | SHIP DATE |
|---|---------|---------|-------|-----------|
| Litton Advanced Circuitry Div 500 Shady Lane Austin, TX 78702 James Henkins 512-385-8110 | Tl-204 | HH-3 | 67955 | 12/18/89 |
| Siltec Inc 1104 East San Antonio El Paso, TX 79901 915-544-7204 | Pm-147 | 10 | 34960 | 11/20/89 |

60 OAK DRIVE - VEECO INSTRUMENTS - SYOSSET, NY 11791
UPA TECHNOLOGY DIVISION
516-364-1080

STATE: Louisiana

| CUSTOMER, ADDRESS, NAME | ISOTOPE | MODEL # | S/N | SHIP DATE |
|---|---------|---------|-------|-----------|
| General Electric 7000 Bert Kouns Ind. Loop Shreveport, LA 71129 318-687-6600 Ruth Burnett | Pm-147 | HH-3 | 85353 | 10/11/89 |

60 OAK DRIVE - VEECO INSTRUMENTS - SYOSSET, NY 11791
UPA TECHNOLOGY DIVISION
516-364-1080

STATE: Nebraska-----

| CUSTOMER, ADDRESS, NAME | ISOTOPE | MODEL # | S/N | SHIP DATE |
|---|---------|---------|-------|-----------|
| Square D Company 1717 Centerpark Road Lincoln, NE 68501 402-423-6721 | Pm-147 | 10 | 44139 | 10/31/89 |

60 OAK DRIVE - VEECO INSTRUMENTS - SYOSSET, NY 11791
UPA TECHNOLOGY DIVISION
516-364-1080

STATE: Colorado

| CUSTOMER, ADDRESS, NAME | ISOTOPE | MODEL # | S/N | SHIP DATE |
|--|---------|---------|-------|-----------|
| NTI Corp 6035 Galley Road Colorado Springs, CO 80915 Randy Lord 719-574-4900 | Pm-147 | HH-3 | 85341 | 10/1/89 |
|] Mile High Equipment 11100 East 45th Ave Denver, CO 80239 Joe Wylie 303-371-3737 | Tl-204 | HH-3 | 7836 | 12/19/89 |

PDR



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 15, 1990

CHAIRMAN

The Honorable John Porter
United States House of Representatives
Washington, D. C. 20515

Dear Congressman Porter:

I am responding to your letter dated December 19, 1989, concerning approval and use of qualified insulating materials inside the containment and drywell at U.S. nuclear power plants. The following information addresses the issues raised in your letter.

The Nuclear Regulatory Commission (NRC) staff has in the past reviewed and approved topical reports submitted by vendors on various commercial products, including insulating materials. Such is the case with the Owens-Corning Fiberglas Corporation Topical Report OCF-1, which was approved in the NRC staff's letter dated December 8, 1978. However, NRC staff approval of a vendor-submitted topical report was neither a recommendation nor an endorsement of a particular product for use over another product. It was merely a technical evaluation of a product's compliance with applicable regulatory criteria. Other vendor products that have been demonstrated to comply with the applicable regulatory criteria are equally acceptable to the NRC.

It is NRC's responsibility and current practice to review for compliance with applicable regulatory requirements individual vendor product topical reports that are specifically referenced by an NRC licensee in a proposed regulatory application at its plant. It continues to be our position, however, that an affirmative finding in a safety evaluation report is not, per se, an NRC endorsement of a product but rather is a finding that a product meets the applicable requirements.

Prior staff review and approval of a particular product used in a change or modification to a plant may not be necessary. Specifically, under the provisions of 10 CFR 50.59, an NRC licensee may make changes or modifications to its facility without prior approval if the change does not require a Technical Specification change or constitute an unreviewed safety question. An unreviewed safety question is not involved if the proposed change does not (1) increase the probability or consequences of an accident or equipment malfunction previously evaluated in the plant safety analysis report, (2) create the possibility of a different type of accident or equipment malfunction than previously

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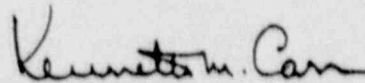
evaluated in the plant safety analysis report, or (3) reduce the margin of safety as defined in the basis of any Technical Specification (Technical Specifications are part of the terms of the plant's NRC operating license). Thus, if a licensee can demonstrate that use of the Advance Thermal Corporation insulation system will not involve an unreviewed safety question, then the licensee may proceed to install the material without prior NRC staff approval, provided there is no need otherwise to change a Technical Specification.

On the basis of the above, NRC staff review and approval of a particular product, such as the Advance Thermal Corporation insulation system, may or may not be required prior to installation or use at licensee facilities. In cases where NRC approval is not required prior to installation or use, NRC regulations make it incumbent upon licensees to confirm that the product conforms to applicable NRC requirements, including any relevant NRC requirements referenced in advertising, in accordance with 10 CFR 50.59.

With respect to equipment manufacturer advertising, it is quite possible for a manufacturer to rightfully claim that a product meets applicable NRC requirements without a prior NRC review and finding to that effect. The NRC strongly believes that any such claims must be accurate and demonstrable. Please feel free to inform Advance Thermal Corporation that it may use this letter to inform its customers that the NRC does not endorse one product over another. If Advance Thermal Corporation desires further information, please have it contact Jared Wermiel, (301) 492-0870, in the Plant Systems Branch, Division of Systems Technology, Office of Nuclear Reactor Regulation.

I believe this explanation should resolve the concerns raised in your letter.

Sincerely,


Kenneth M. Carr