

SGTB:MG  
71-9024

OCT 12 1990

St. Louis Testing Laboratories, Inc.  
ATTN: Mr. Scott Zimmer  
2810 Clark Avenue  
St. Louis, MO 63103

Dear Mr. Zimmer:

This refers to your application dated April 18, 1990, as supplemented August 17, 1990, requesting renewal of Certificate of Compliance No. 9024 for the Model No. STL-201 package. Since an application was submitted at least 30 days prior to the expiration of the Certificate of Compliance, the Certificate of Compliance will not be deemed to have expired until the application has finally been determined.

In connection with our review, we need the information identified in the enclosure to this letter.

This information should be provided within 45 days from the date of this letter. Additional information requested by this letter should be submitted in the form of revised pages. If you have any questions regarding this matter, we would be pleased to meet with you and your staff.

Sincerely,

**Original Signed by**

Charles E. MacDonald, Chief  
Transportation Branch  
Division of Safeguards  
and Transportation, NMSS

Enclosure: As stated

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OPERATING PROCEDURES

1. Revise the operating procedures to address the steps to be taken in preparing the isotope exposure device for shipment. As a minimum, these steps should include verification that the Ir-192 isotopic source is in the shielded position, the exposure device is locked and the shipping plug is installed.

If the exposure device is to be shipped without the Ir-192 isotopic source, the operating procedures should also include the specific tests or measurements that will be made prior to each shipment of an empty exposure device to assure that the exposure device is empty. The tests or measurements should be capable of detecting the presence of a source assembly, even if the cable (pigtail) has been removed or shortened.

2. Revise the operating procedures to assure that prior to each shipment the package external dose rates and surface contamination levels are within the limits prescribed by 10 CFR §71.47 and 10 CFR §71.87.
3. Revise the operating procedures to include the application of a tamper indication feature as required by 10 CFR §71.43(b).
4. In steps 3 and 7 of the operating procedures, it is not clear whether the "source" to be placed in the canister refers to the exposure device or to the Ir-192 isotopic source. Revise the operating procedures to clarify this ambiguity.

MAINTENANCE PROGRAM

Revise the maintenance program to include periodic inspection of the isotope exposure device.