

NOV 21 1995

X-R-I Testing
Division of X-Ray Industries, Inc.
ATTN: Larry Redhage
NRC Records Administrator
1961 Thunderbird
Troy, MI 48084

Dear Mr. Redhage:

This references your amendment request in the form of a letter dated October 12, 1995 requesting a variance/waiver from the equipment criteria specified in 10 CFR 34.20 due to go into effect January 10, 1996. We will forward your request to our Division of Industrial and Medical Nuclear Safety, NMSS, in Washington, D.C. for their evaluation.

Before we forward your request, you need to clarify your request and to demonstrate that XRI testing has acceptable engineered safety features and/or procedures in place to compensate for the required safety provisions. To accomplish this, please address the following:

1. If XRI testing wishes to request authorization to use exposure devices after January 10, 1996, which do not meet all requirements of the regulations in 10 CFR 34.20, then XRI Testing needs to apply for exemptions to specific sections of the regulations pursuant to the provisions of 10 CFR 34.51. For example, you should determine (from the device registration sheet) whether the device was prototype tested in accordance with American National Standards Institute N432-1980 (ANSI-N432). If not, an exemption from 10 CFR 34.20(a) for the devices would be necessary. You should also consider other associated equipment used with the device, i.e., device cables, guide tubes, exposure heads, etc. For example, it may be appropriate to request an exemption to the requirements of 10 CFR 34.20(a), (c)(2) and (e), pursuant to 10 CFR 34.51, effective January 10, 1996, to use Model ____ exposure device and Model ____ control system.
2. Specify the date when the Co-60 will have decayed sufficiently that you will discontinue use of the Gamma Industries Utility Twin 50 and the AMSHM-Tech Ops 520.
3. A complete description and discussion of the door interlock system for each fixed facility and how this system operates to keep the source from being exposed.

4. A complete description and discussion of any other radiation alarm systems installed in each facility, and how these alarms might help to prevent the source from being inadvertently exposed.
5. A copy of XRI Testing facility operating procedures which include provisions for ensuring that the source is not inadvertently exposed.
6. Contact the manufacturers of both exposures devices and confirm to us that they will continue to support the devices, i.e., provide replacement parts.

If you have any question, or require clarification on any of the information stated above, you may contact us at (708) 829-9887.

We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 99324.

Sincerely,

Original Signed By
Loren Hueter
Nuclear Materials Licensing Branch

License No. 21-05472-01
Docket No. 030-04837

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