

AUG 20 1986

FCML/DNM
030-06545
(019711)

Department of the Navy
Naval Surface Weapons Center
ATTN: Richard T. Whitman
White Oak
Silver Spring, MD 20910

Gentlemen:

This refers to your application dated April 14, 1986, requesting an amendment to reactivate License No. 45-02757-01 to perform industrial radiography. Additional information is needed in support of your amendment request.

To help you in providing the necessary information we have enclosed a copy of the draft proposed Revision 2 to Regulatory Guide 10.6, "Guide for the Preparation of Applications for the Use of Sealed Sources and Devices for Performing Industrial Radiography." You should refer to the appropriate sections of the guide and provide information concerning the following:

1. Renewal of License No. 45-02757-01

Your request is for an amendment to reactivate your license. Pursuant to your letter dated January 24, 1986, the one year extension was granted for the purpose of allowing adequate time for disposal of radioactive materials you possessed and termination of your license. Since you are going to resume radiography activities you need to apply for a renewal of your license and supply the required information as identified in Regulatory Guide 10.6 section 5 item 2.

2. Leak Test Procedures

In your renewal request of License No. 45-02757-01, you need to submit how the leak tests of sealed sources will be performed. Please refer to Regulatory Guide 10.6 for additional guidance.

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3. What sources are in your possession?

Your present license authorizes possession of the following sealed sources; Budd Company Model 34500, Budd Company Model C-173 and Picker Corporation Model 3800-A and you request a different source. Do you still possess the sealed sources presently authorized by your license. If not, please provide the date and method of disposal.

4. Qualifications of Radiographers and Assistant Radiographers

Please supply documentation of training of radiography personnel, as stated in 10 CFR 34.11(b) and 34.31. Refer to Regulatory Guide 10.6 items 8(2), 8.1 paragraph 4 and 8.2 paragraph 3 for additional guidance.

5. Experience of Mr. Marders

We notice that Mr. Marders has 15 years of experience in radiography at the Naval Surface Weapons Center. Has at least three months of this been on-the-job-training in radiography using gamma emitting sealed sources?

6. Periodic training of radiography personnel

We need a description of your periodic training program. Please refer to Regulatory Guide 10.6 Item 8.2 paragraph 6 for additional guidance.

7. Clarification of personnel and responsibilities

Please provide clarification of the responsibilities of Mr. Purser. Specifically, which particular audits and functions will he perform. Also, on pages 20-23 of your amendment request several references are made to the Head Radiographer and RSO as if they were the same person, please clarify.

8. Clarification of exposure device

In several places in your Radiation Safety and Operating Procedures section of your amendment request you refer to the exposure device as the Budd Multitron please clarify. The specific locations are on pages: 16 A.1a, 19 C.6, 20.C.6.a, 20 D.2.a and 26 J.12.6.

If you have any questions, please contact me at (301) 427-4052. Please reply in duplicate within 30 days and refer to control No. 019711.

Sincerely,
Original Signed By
Donald N. Mackenzie

Donald N. Mackenzie
Material Licensing Branch
Division of Fuel Cycle and
Material Safety

Enclosure: As stated

cc: Mr. P. J. Durfee

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