

From: david_bennett@agilent.com
To: Ullrich, Elizabeth
Cc: esmeralda_anaya@agilent.com
Subject: [External_Sender] FW: your request for an extension to the COVID relief
Date: Thursday, August 13, 2020 9:30:55 AM

Dear Ms Ulrich,

Thank you for your quick response. Please see my responses in red below.

Please let me know if you have any questions.

Dave
302-636-8262

From: Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>
Sent: Thursday, August 13, 2020 7:26 AM
To: BENNETT, DAVID S (Agilent USA) <david_bennett@agilent.com>; ANAYA, ESMERALDA (Agilent USA) <esmeralda_anaya@agilent.com>
Subject: your request for an extension to the COVID relief

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Mr. Bennett,

This refers to the August 5 letter, requesting an extension of the exemption of the requirement to perform the 6-month inventory and leak-testing of the ECDs containing sealed sources. We understand from your letter that a minimal number of employees are returning to work in some laboratories, and you do not yet know which employees may need to work with ECDs. You also stated that there is not yet a date set for return of all workers to the site.

1. We note that License Condition 14.D. does not require leak testing of sources that remain in storage. However, the sources must be leak tested prior to returning to use. It does not appear that any exemption is needed for the leak testing at this time. **Understood.**
2. You stated that workers who plan to use ECDs will be required to perform the leak test and inventory prior to use. That is acceptable. However, if there are cases where there are ECDs present in laboratories to which workers have returned, then the worker should perform an inventory of all ECDs present in that laboratory, regardless if the ECD will be used. Confirm that workers will perform an inventory of

the ECDs present in the laboratory to which they return to work, and will report the applicable information to you for your inventory records. **I confirm that this will be done.**

3. Confirm if the laboratories that contain ECDs, to which workers will not be returning, are secured from access by those that are returning. **I confirm. All laboratories are controlled by key-card access only and access is granted to only those individuals that require access to the lab. Lab owners are responsible for providing clearance to security.** If they are not secured, explain why returning workers could not perform the physical inventory to verify that the ECDs are present.

We will continue our review when we receive your response. Please contact me if you have any questions.

Betsy

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