SEILER

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Manufacturing • Geospatial • Medical • Planetarium • Design Solutions

US NUCLEAR REGULATORY COMMISSION
Region III
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532-4352

September 29, 2020

License # 24-24451-01 amend #18
Docket # 030-28598

Dear Mr. William Reichhold & Magdalena Gryglak
Material Licensing Division

Seiler has been working with our tritium air monitor vendor and it has come to a point that our monitor is no longer serviceable.
Thus the current Radiation Safety Program here at Seiler Instr. needs to be updated to reflect that this option of using the strip recorder for air monitoring purposes is no longer possible. In our review of current tritium air monitoring equipment the portal units do not have the "strip recorder" features. We wish to continue our program with air monitoring when necessary and recording the air results when breakages occur on our breakage report. We will continue noting readings as clean or not when doing receiving inspections. Finally we use the air monitor to check the environmental chamber after testing and BEFORE it is open to remove product or instruments containing tritium.

On page 13 in Section 9 first paragraph we wish to remove the last sentence.
On page 14 in Section 9a point 4 Record Keeping we wish to remove

I have attached the 2 pages affected by this air monitor no longer being available for your review. We have other portal air monitors that we can use in this program but they do not have the strip recorder ability.

May I ask that you please review and let me know if the NRC requires anything further from us?
Thank you for working with us.

Andrew G. Leahy
Contract Adm. & Radiation Safety Officer
314-968-2282 ext 356 switchboard
314-218-6356 direct

Section 9

Air Monitoring Program

While license material is present on site the air in the work areas will periodically be monitored. This monitor shall be equipped with an internal settable alarm and an audible and visual remote alarm. A recorder will also be used to record the levels of airborne contamination.

Routine measurement shall be made whenever sources are received, periodically during the assembly process, during instrument performance testing, in the storage areas for both assembled units and units under testing and the unused source storage area.

Emergency procedures established in **Section 14** should be followed as dictated per air concentration found.

Action levels shall be as follow: (measurements are in uCi/ml)

1. At	≤ BACKGROUND	work may proceed
2. At	Background to 4x(10E-6)	continue monitoring; Identify the source of contamination. Place in vented storage cabinet for leaking sources **NOTIFY RSO**
3. At	≥ 4x(10E-6)	continue monitoring Identify the source of contamination Place in vented storage cabinet for leaking sources **STOP WORK, LEAVE THE AREA, and NOTIFY RSO**
4. At	≥ 2x (lOE-5)	continue monitoring **EVACUATE THE AREA NOTIFY RSO**

If during monitoring a source is identified as leaking it shall be isolated and transferred to the storage cabinet for leaking sources. The area will be evaluated by the RSO to determine actions that may need to be taken before work may continue in the area.

Section 9a

AIR MONITORING PROCEDURES

1. Preliminary Steps

   A. Allow 5 minutes for instrument to "warm up".

   B. The instrument is now set to measure the radioactivity content of the surrounding air. If it is desired to draw air from a specific location (as a glove box or stack) and return the air to that-'location, 1/4" OD hoses up to ~~six~~ 4' feet long may be slipped into the inlet and outlet connectors.

2. Frequency of Air Monitoring

Unless air concentrations are above background, which would require increased surveillance; the tritium room, the fume hood and the storage cabinet will be monitored on a weekly basis during production. Monitoring of the environmental chamber and the area near the vibration tester will be performed whenever tests are in progress.

3. Length of Monitoring

Unless an elevated air concentration is found, each area will be monitored for at least 10 minutes or until the air monitor gives a stable reading. If an elevated concentration is found, monitoring should continue until the concentration has been reduced to the background level. During assembly of source material into instruments the air monitor shall be continually running and recording.

4. Record Keeping

All results of air monitoring will be printed on a strip chart recorder.

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Action levels shall be as follow: (measurements are in uCi/ml)

1. At	$\leq$ BACKGROUND	work may proceed
2. At	Background to 4x(10E-6)	continue monitoring; Identify the source of contamination. Place in vented storage cabinet for leaking sources **NOTIFY RSO**
3. At	$\geq$ 4x(10E-6)	continue monitoring Identify the source of contamination Place in vented storage cabinet for leaking sources **STOP WORK, LEAVE THE AREA, and NOTIFY RSO**
4. At	$\geq$ 2x (lOE-5)	continue monitoring **EVACUATE THE AREA NOTIFY RSO**

If during monitoring a source is identified as leaking it shall be isolated and transferred to the storage cabinet for leaking sources. The area will be evaluated by the RSO to determine actions that may need to be taken before work may continue in the area.

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Willour, Jeffrey

From: Song, Taehoon
Sent: Wednesday, September 30, 2020 9:58 AM
To: Willour, Jeffrey
Subject: FW: Inquiry, license no. 24-24451-01
Attachments: 3916_001.pdf; 3912_001.pdf; 3914_001.pdf

Green 665

From: Tomczak, Tammy <Tammy.Tomczak@nrc.gov>
Sent: Wednesday, September 30, 2020 8:47 AM
To: Song, Taehoon <Taehoon.Song@nrc.gov>; Pavon, Sandy <Sandy.Pavon@nrc.gov>
Subject: FW: Inquiry, license no. 24-24451-01

Good morning, Sandy and Tae,

Please add the attached to ADAMS.

Thank you!!!
Tammy

From: Gryglak, Magdalena <Magdalena.Gryglak@nrc.gov>
Sent: Wednesday, September 30, 2020 8:43 AM
To: Tomczak, Tammy <Tammy.Tomczak@nrc.gov>
Cc: Orlikowski, Robert <Robert.Orlikowski@nrc.gov>
Subject: FW: Inquiry, license no. 24-24451-01

Good morning Tammy,

This is a new amendment.

Thank you
MG

From: Leahy, Andrew <aleahy@seilerinst.com>
Sent: Tuesday, September 29, 2020 2:53 PM
To: Gryglak, Magdalena <Magdalena.Gryglak@nrc.gov>
Subject: [External_Sender] Inquiry, license no. 24-24451-01

Magdalena,

Good afternoon to you.
I have attached the letter you have requested and am resubmitting the two documents affected by this requested change.
Kindly review and let me know if you need anything further.

Thank you

Andrew G. Leahy
Contract Adm. & Radiation Safety Officer
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314-218-6356 direct
aleahy@seilerinst.com