



U.S. Customs and Border Protection

Attn: License Administration
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road – Suite 102
King of Prussia, Pennsylvania 19406

SUBJECT: U.S. CUSTOMS AND BORDER PROTECTION, REQUEST FOR
ADDITIONAL INFORMATION, MAIL CONTROL NO. 643999

This correspondence is in response to your letter dated February 14, 2025, requesting additional information to our application and letter dated November 6, 2024, to amend NRC License No. 08-17447-01 to implement a more risk-based inspection program.

The following responses are italicized below each question forwarded in your letter requesting additional information.

1. You are seeking to reduce the frequencies of the inspections performed by CBP Regional Health Physicists, for lower risk devices/sources. Please list the types of devices/sources you consider having lower risk that would fall in this category?

The devices/sources we consider having a lower risk are Itemizers, Vapor Tracers, CSECO K910 Buster, and Leidos Xpose Portable Density Meters. The radioactive material contained in the Itemizers and Vapor Tracers under ordinary conditions of handling, storage, and use will not be released or inadvertently removed from the source housing. In addition, there are two radioactive material labels to warn personnel of the radioactive sources that reside inside the device. For redundancy in safety, one label is on the outside of the device and the other is on the detector housing on the inside of the instrument. The density meters all have exempt quantity material per 10 CFR 30.71, Schedule B.

2. In your letter dated November 6, 2024, you requested a change in radiation safety inspections schedules for lower risk radioactive sources and devices. However, you described your proposed inspection frequencies in three different ways:
 - a. Paragraph 2: "periodic inspections;"
 - b. Paragraph 4: "on an as needed basis;"
 - c. Paragraph 5: "a representative sample?"

All inspections will be conducted periodically based on the risk level of that device. The verbiage used in our application "on an as needed basis" or "a representative sample" were specifically used to demonstrate how inspections for lower risk sources/devices (e.g., CSECO K910 Buster and Leidos Xpose Portable Density

Meters) are conducted and included in an annual inspection of our high-risk sources. The regional Health Physicists (HP) inspect and inventory each lower risk sources/devices during these annual higher risk inspections.

Please clarify what inspection frequencies you are proposing for lower risk devices/sources.

3. Are all “lower risk sources,” included in the biannual Physical Systems Application and Products (SAP) inventories?

Yes, these lower risk sources are captured on SAP inventories.

4. What are the differences in the inspection elements between the SAP inventories and the inspections performed by the CBP Regional Health Physicist for lower risk sources.

The SAP inventories are conducted for accountability by the local station and not by the CBP Regional Health Physicists. The inspections performed by our regional Health Physicist focus on working with the personnel utilizing these devices to ensure they understand NRC and CBP requirements, proper usage and storage of the equipment, and emergency procedures.

5. Could you please provide your inventory of CSECO K910 Buster and Leidos Xpose Portable Density Meters.

Due to the geographic expanse of CBPs radiation safety program it is not logistically feasible to include these small-scale devices semiannually and would be a significant effort to obtain and would likely yield different results day to day based on how the equipment is used/shared. There are 845 CSECO K910 Busters and 1452 Leidos Xpose Portable Density Meters currently in our inventory reported by our Integrated Logistics Division (ILD). These devices are transferred (due to operational need) between local sites on monthly, weekly and/or daily basis. The local sites are responsible for transfer documentation along with conducting their SAP inventories. The biannual SAP inventories ensure accountability at the local port or station level. Our Regional HPs conduct annual inspections for locations with higher risks and inspect all small handheld equipment on site. Their inspections focus on working with the personnel utilizing these devices to ensure they understand NRC and CBP requirements, proper usage and storage of the equipment, and emergency procedures

The amendment requesting changes to our inspection cycle were to enable us to prioritize high risk inspections utilizing the guidance from the NRC Inspection Manual Chapter 2800.

U.S. Customs and Border Protection is committed to maintaining compliance with our license.

Any questions regarding this request should be forwarded to Mr. Marvin Earles, CBP Radiation Safety Officer at 832-887-5071 or via email at marvin.r.earles@cbp.dhs.gov.

Sincerely,

p.p.

Mic McKeighan

Director, Occupational Safety and Health Division

Office of Human Resources Management

U.S. Customs and Border Protection

317-710-9642