



June 9, 2000

USNRC
Materials Safety Branch
Division of Industrial and Medical Nuclear Safety
Two White Flint North
11545 Rockville Pike
North Bethesda, MD 20852

Dear Sir:

This letter is to apply for an amendment to the Metorex Registry NR-701-D-101-B to restore the SUPS probe to that registry. In response to an earlier letter, dated January 14, 2000 (Attachment A) I received a letter dated February 15, 2000, from Mr. John Jankovich for Mr. F. Sturz (Attachment B). As I pointed out in the previous submission, these probes are no longer manufactured, and as a result, we needed to arrange to borrow a customer unit for the radiation testing. This took some time and is the main reason for the delay in responding to the letter of February 15, 2000. Most of the points which were raised in the February 15, 2000 letter are covered in this revised submission, however, a few do not properly fit into the probe description and I have chosen to comment here instead (the number is from the comments on February 15, 2000):

1. Attachment C is a copy of my letter of November 12, 1999 with all of the enclosures which were attached.
3. The original registrations by CSI were for general license only, however, as Metorex indicated in a previous amendment request (dated July 6, 1996), with more states requiring General License Acknowledgement or in some case specific licenses, we are now shipping probes to both general and specific licensees. Thus, this request should be considered for both general and specific license distribution.
5. In several places the documentation submitted in the January request indicated that the unit must be used by operators trained in the use and safety of the instrument. Mr. Jankovich properly points out that generally licensed instruments must be designed for operation by users without any training. However, Metorex still believes that it is better for the operator to receive training in the use and safety of the instrument. Therefore, we have changed the wording in the revised manual to indicate that the user should be trained in the operation and safety of the unit.



6,20,21. The "General License" manual (Attachment D) has been extensively revised to better advise the user on the obligations of the general license and include the SUPS probe specifically. Once approved, this manual will be shipped with each probe covered by the registration which is being amended. In that manual, advice and instructions is given for handling a damaged instrument. Attachment E is the corresponding procedure which is used here if we receive notification of a possible problem, or receive a damaged probe.

12. The different probes are differentiated by the Model number not the serial number. Thus, if new units were manufactured, the Technical Data Sheet lists the model number as SUPS 0484 or SUPS 2476. The serial numbers of Metorex products are sequential regardless of model number.

13. No inherent tamper proof mechanism was included in the original design of either SUPS probe. In a letter dated July 25, 1995, Metorex committed to replace one screw in each probe with a tamper proof screw (a copy of the catalog page describing the screw is attached, Attachment F). This procedure is used for any SUPS probe which is sent to Metorex for service. This will prevent the user from gaining access to the source inside the probe.

I hope that these answers and the attached documentation on the SUPS probes (Attachment G) will allow you to complete the review of the requested amendment. If you have any questions please contact me by telephone at (609) 406-9000 x122 or by email at John.Patterson@MetorexUSA.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'John I.H. Patterson', with a long horizontal line extending to the right.

John I.H. Patterson, Ph.D.
President

JHHP/jlr
Enclosures