

DL-060694-02

OFFICIAL RECORD COPY

JUN 06 1994

Scan Technologies, Inc.
ATTN: Deibert W. Devins
Vice-President/General Manager
147 11th Avenue
Charleston, WV 25303

Gentlemen:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING LICENSE RENEWAL
APPLICATION DATED MAY 14, 1991
(REFERENCE CONTROL NO. 118827; DOCKET NO. 030-33222)

This letter refers to your radioactive materials license renewal application dated May 14, 1991, for NRC License No. 47-30052-01 (formerly No. 37-20807-01). The following information is needed to continue our review of your application:

1. In a letter dated June 7, 1993, you requested that Walter J. Ramsey be named as a "responsible individual" on the license and be authorized to use or directly supervise the use of licensed material. You also requested that he be named as the Radiation Protection Officer (RPO) on the license. As a demonstration of Mr. Ramsey's qualifications to be named as a "responsible individual" and RPO, you submitted a copy of his training certificate for successfully completing the COALSCAN Short Course in Radiation Safety for COALSCAN Users.

Please submit a resumé of Mr. Ramsey's training and experience in the services you intend for him to perform on the devices and sources included in your license application. His formal training in radiation protection should include a minimum of 40 hours of formal course work in the subjects described in Item 7, paragraph 2.a. on page 7 and 8 of the enclosed draft regulatory guide FC 411-4, "Guide for the Preparation of Applications for Licenses for the use of Radioactive Materials in Servicing Preregistered Gauges, Measuring Devices, and Sealed Sources Used in Such Devices", (enclosure 1). He should also have on-the-job training for each service and for each device or source included in your license application. If he has attended additional device manufacturers' courses, please provide a copy of the certificate received from each course and identify by model number the devices and sources upon which he is certified to perform the specified services requested in your application.

2. In Item 8 of your renewal application, you state that all individuals approved for licensed material use have had a minimum of 16 hours of radiation safety training, in addition to the on-the-job training in the handling of licensed materials. Please provide a further description of your training program that demonstrates that each "responsible individual" will:

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- a. receive a minimum of 40 hours of formal course work on the topics described in paragraph 2.a. of Item 7, page 7 of FC 411-4.
 - b. complete the device manufacturer's training course (or equivalent) on the installation and servicing of each specified device requested in the application.
 - c. receive on-the-job training that consists of hands-on training either under the supervision of the manufacturer's personnel specifically authorized to perform the service training or under other individuals specifically licensed to perform the service training.
 - d. receive training to remain current on the servicing of the gauging and measuring devices, new equipment to be serviced, and any factory modifications of existing equipment.
3. Describe the training you will provide to ancillary personnel who may frequent any radiation area or work under the direct supervision of your "responsible individuals". Include in your description, an outline of the training program, the duration of the training, the name or title of the instructor(s) and the records you will maintain to document this training
 4. Regarding the training provided to customer personnel, please confirm that only "responsible individuals" will provide this training or provide the name(s) and qualifications of any other individuals who may provide this training. Also please provide an example of the examination given to customer personnel at the conclusion of the training and an example of the certificate provided to customer personnel upon successful completion of the training.
 5. Please describe the work area where you intend to remove and/or install sources into devices, the restricted and unrestricted areas that are established when sources are installed or removed, how access to the restricted area is controlled, and how you comply with the dose limits for individual members of the public described in 10 CFR 20.1301. If you perform these procedures at customer facilities, describe how these items are addressed at these facilities.
 6. Please provide an updated copy of your Radiation Safety Manual (RSM) or provide amended pages for the RSM included with your renewal application that describe the current locations of use, personnel, and procedures you follow when performing licensed activities. This document should be based on the current 10 CFR Part 20, "Standards for Protection Against Radiation" (enclosure 2).

Also, please submit an outline of the basic elements of your operating and emergency procedures provided to your personnel for installing, removing, repairing or otherwise servicing devices at customer facilities. The elements listed in paragraphs 10.3.1 and 10.3.2, on pages 14 and 15 of FC 411-4, as applicable to your licensed activities,

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should be addressed in your response. Also include copies of the reports on the final survey of installed devices showing radiation profiles obtained in both the "on" and "off" positions.

7. Specify the frequency at which personnel thermoluminescent dosimetry devices (TLDs) will be changed and analyzed.
8. Please clarify if the circumstances described in paragraphs 1. a. and b. on page 8 of your RSM are intended as conditions under which each area or room where radioactive materials are used or stored will not be posted with the words CAUTION -- RADIOACTIVE MATERIALS.
9. In paragraph 1. of item G on page 16 of your RSM, you state that radioactive contaminated waste generated as a result of surveys, tests, or other means, shall be retained in storage at Scan Technologies, Inc.'s facility until the activity level is sufficiently low enough for it to be safely disposed. Although decay in storage is a means of disposal of licensed material described in 10 CFR 20.2001, this option does not allow material that has decayed in storage to be released to unrestricted areas for disposal. Once the waste has decayed, it must still be disposed of by one of the other allowed forms of waste disposal in part 20, or the specific conditions given in any NRC or Agreement State license conditions. The NRC has not granted a license condition that allowed a licensee to release decayed in storage wastes for radionuclides with a half-life longer than 120 days.

Therefore, you may decay radioactively contaminated wastes in storage, but further action by the NRC will be required prior to disposal of the wastes, if you desire to dispose of the waste by a means other than one of those additional means described in 20.2001. Please confirm that you will dispose of radioactive waste by a means authorized by 20.2001, and that radioactive waste held for decay in storage will be disposed of by one of the other allowed forms of waste disposal described in part 20.

10. On page 28 of your RSM, you reference 49 CFR Part 173.391(b). Part 173.391(b) does not exist in the current 49 CFR. Please review this part of your RSM and describe the correct parts of 49 CFR that pertain to exceptions for specification packaging that apply to the devices you will transport by commercial means. Parts 173.421, 173.422 and 173.423 of 49 CFR describe exceptions and limitations that apply to shipments of limited quantities of radioactive material or radioactive material contained in instruments and articles.
11. Describe the counting room or area within your facility where the leak test samples are analyzed. Also describe the procedures you follow to calibrate the instruments used to analyze the wipe test samples and list the standard sources used to calibrate this equipment by nuclide and activity. Specify if each source has an accuracy of 5% traceable to the National Institute of Standards and Technology (NIST).

In your response, describe your rationale and procedures for using a Nucleus Model WP-2000 well counter with a Model 2010 Analyzer-Amplifier

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and Model 525 Scaler/Ratemeter to analyze wipes of Americium 241 and Californium 252 sources. Provide an example of a calculation for converting leak-test sample counting results to microcuries for a sample from a Cesium 137 source versus Americium 241 and Californium 252 sources.

12. Please provide a copy of the leak test certificate you use to document the results of leak tests performed for your customers.
13. In paragraph g. on page 15 of your RSM, you state that annual physical inventories shall be performed on all sealed sources and recorded in the Radiological Survey Log. Condition 15 to your current license requires that you perform a physical inventory every 6 months to account for all sources and/or devices received and possessed under the license. Based on past incidents of lost or improperly disposed sources and/or devices, which were due in part on the failure of the licensee to adequately account for the sources and/or devices in its possession, the NRC routinely requires licensees to perform a physical inventory every 6 months.

Please confirm that you will perform a physical inventory of all sealed sources and/or devices you possess under this license every 6 months or describe your reasoning for determining that an annual inventory is sufficient to maintain an adequate level of accountability for the sources and/or devices possessed under this license.

14. In Item 7.A. of your renewal application you list the names of the "responsible individuals" who will use or supervise the use of licensed material and you indicate that others approved by the radiatior. safety officer may use or supervise the use of licensed material. You are reminded that "responsible individuals" listed on your license as individuals authorized to use or supervise the use of licensed material must also be approved by the NRC and be specifically named in Condition 11. A. of your license.

Our review of your license renewal request will continue upon receipt of the above requested information. In addition to FC 411-4 and 10 CFR Part 20, a copy of FC 412-4, "Guide for the Preparation of Applications for Licenses for the Use of Radioactive Materials in Leak-Testing Services" is enclosed to assist you in responding to this correspondence (enclosure 3).

Please provide two copies of your reply and refer to Control Number 112827. If you wish, replies may be transmitted via electronic facsimile (FAX) to (404) 331-5559. You should then mail the original copy of any electronically transmitted documents.

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In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

If you have any questions, please call me at (404) 331-0344.

Sincerely,

Jay L. Henson
Health Physicist
Nuclear Materials Licensing Section

Enclosures:

- (1) - FC 411-4
- (2) - Part 20
- (3) - FC 412-4

MEMO	TO	DATE	NO COPY	YES	NO	YES	NO	YES	NO	YES	NO
	NAME	DATE	YES	NO	YES	NO	YES	NO	YES	NO	NO
	JHenson	05/27/94									
	FWright	05/27/94									
	JPotter	06/6/94									

CONVERSATION RECORD

TIME 3:00 DATE 5/26/94

TYPE VISIT CONFERENCE TELEPHONE INCOMING OUTGOING

ROUTING	
NAME/SYMBOL	INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU: **Robert W. Devins** ORGANIZATION (OR Bus. Org., Emplov. Org.): **Sea Technology** TELEPHONE NO. (717) 751-0233

SUBJECT: License Renewal (47 30052 01) Application

SUMMARY

① Informed Mr. Devins that licensing action transferred to Region II. Completing my review and will be sending request for additional information.

② One point to clarify, how do the count the leak test samples from Am-241 and Cf-252 sources? Do same system for all sources, or say they are distinct & from Am-241 & Cf-252

③ Address the record failure in correspondence regarding license application - WV office.

④ Consider submitting new renewal package in response to the letter, incorporating information (over)

ACTION REQUIRED

NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE

ACTION TAKEN

SIGNATURE	TITLE	DATE

from previous letters 6/1/93 & 6/14/93 -
plus additional information requested
by this new NRC letter. Prompted by
time past since original renewal application
(3/14/91) and regulatory change (New York
and change in licensing system
would rather just renege question
and not submit another package