



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555 - 0001

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TO: File NR-0126-D-101-G

FROM: Michele L. Burgess *mlb*  
Material Safety and Inspection Branch, IMNS/NMSS

RE: Air Products and Chemicals, Inc (APCI) transfer to inactive status

SSD action 99-31 was initiated by NRC in order to resolve discrepancies and confusion within the registration certificate.

Item 1 - correct discrepancy regarding the leak test frequency. Registration certificate being corrected to read not required throughout.

The labeling section indicates not required. The first page and the limitations sections indicate 6 month frequency. 31.5(c)(2)(ii) indicates not required. Original application requested not required. License indicates not required. APCI indicates that leak testing is not being done (i.e. not required).

Item 2 - correct confusion regarding model numbers on license and registration certificate. Registration certificate being changed to inactive and changed to reflect both IMA-1A Analyzer and 4402A cell, and will reference both the Delphi model 4402 cell and the Safety Light model LAB 508-3 foil as associated sources.

APCI has distributed the APCI model IMA-1A Analyzer, containing either the APCI model 4402A cell or the Delphi Instruments model 4402 cell (registered separately by Delphi under CA-254-D-102-G). They have been making quarterly reports under the cell model numbers.

Region I says that APCI is authorized to distribute the Delphi cell under license number 37-05105-07. Since the Delphi model 4402 is registered separately and the APCI license allows distribution of the Delphi cell per the CA certificate, APCI does not need to maintain an active registration certificate referencing the Delphi model 4402 cell.

APCI no longer manufactures nor distributes the 4402A cell, and indicates that they do not intend to do so in the future. APCI refurbishes and resells old IMA-1A Analyzers, but has committed that they will not redistribute the 4402A cell. All devices not being sent directly back to the original owner will have the 4402A cell replaced with a Delphi model 4402 cell.

The IMA-1A Analyzer will be maintained as a model on the registration certificate to maintain reference since it has been a registered model number for almost 15 years, and since some licensees may have the unit listed as such in inventories and records. The 4402 cell will also be listed as a model number on the registration certificate in order to provide a link to the new GLTS database as a registered model number, since earlier distributions were reported under the 4402A rather than the IMA-1A.