December 12, 2003

Kenath Traegde, Supervisor
Materials Licensing Section
Radiation Control Program
Massachusetts Department of Health
90 Washington Street
Dorchester, MA 02121

Dear Mr. Traegde:

On November 5, 2003, you requested guidance from the Nuclear Regulatory Commission (NRC) regarding the inclusion of associated equipment on SSD certificates. You requested this information because, while you understand that an SSD certificate for separate and independent associated equipment is no longer required, you questioned whether an SSD certificate for an industrial radiography source, device, or system must identify the compatible associated equipment to be used.

In response to your question, please note that there is no requirement to identify associated equipment in an SSD certificate. Only as a matter of convenience, an SSD applicant may include the description of associated equipment that is compatible with the radiographic source or device on the certificate; however, there is no requirement to do so. We recommend that you clarify this information with AEA Technology, QSA, Inc.

On July 15, 2003, a notice of denial of the Amersham Corporation's petition for rulemaking (PRM 34-5) was published in the Federal Register (68 FR 41757). The Federal Register notice states that NRC has discontinued the practice of registering associated equipment because NRC determined that the Commission's regulations do not require associated equipment to be registered. Subsequently, the petitioner requested that you amend SSD Certificate Number MA-1059-D-125-S by replacing the table of associated equipment parts and models with a single statement that the associated equipment shall meet the ANSI N432-1980 performance criteria.

The regulations do require a licensee to use industrial radiography equipment that has been manufactured and tested to meet radiation safety design and performance criteria in accordance with a national consensus standard (ANSI N432-1980). The life cycle test in ANSI N432-1980 is an evaluation of the endurance of a source or device. To test the life cycle of an industrial radiography source or exposure device, all components of the industrial radiography system (including the associated equipment) must be assembled and operated for the duration of the test. This requirement, the NRC determined, is sufficient to maintain safety. Therefore, in response to PRM 34-5, the NRC determined that the previous practice of registering associated equipment under 10CFR 32.210 was not only not required, but was also an unnecessary regulatory burden.

To reduce unnecessary regulatory burden for IMNS and the States which are authorized to evaluate SSDs, the Federal Register notice indicated that the NRC does not intend to revise current SSD registration certificates only to remove references to associated equipment.

For further assistance, please contact Dr. John P. Jankovich of my staff at 301 415-7904, e-mail address at jpj2@nrc.gov. Thank you for the opportunity to assist with this matter.

Sincerely,

/RA/

Thomas H. Essig, Chief
Materials Safety and Inspection Branch
Division of Industrial and Medical
Nuclear Safety
Office of Nuclear Material and
Safeguard

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