Honeywell

Honeywell Inc.
P O Box 49266
1190 West Druid Hills Drive NE
Atlanta GA 30329-1266

April 22, 1993

Georgia Department of Natural Resources
Radioactive Materials Section
Attn: Tom Hill
4244 International Parkway Suite 114
Atlanta, GA 30354

Dear Mr. Hill:

As indicated below, Honeywell is requesting that the Radioactive Materials License GA.832-1G and the Lippke System Device Registration both be amended. Two checks in the amount of $550.00 and $1200.00 are included with this request for amendments.

The requested amendments are:

1. Change the official company name to: Honeywell, Inc.
   Industrial Automation & Control
   1190 West Druid Hills Drive
   Atlanta, GA 30329

2. Change the Radiation Safety Manual and Field Service Radiation Safety Procedures in their entirety as indicated by the enclosed attachments.

   The Honeywell 'Radiation Safety Manual' and Honeywell 'Field Service Radiation Safety Procedures' have been re-written. There are many small changes in both manuals. I have highlighted these changes in one copy submitted to you to aid in your review of these documents. It should be noted that the 'Radiation Safety Manual' is a separate document, but is also included as an integral part of the 'Field Service Radiation Safety Procedures'. The changes made to these documents take into account name changes, technical changes in procedures and changes with licensing authorities.

3. Delete the Finnograder and Zikonix/Alkonix products from the Radioactive Materials License, but allow the Am-241 (AMCL) 100 mCi radiation sources to continue to be stored at Honeywell until an eventual disposal facility can be found.

4. Amend the license to reflect a decrease in the maximum single source size for Fe-55 from 400 mCi to 100 mCi. The maximum quantity to be possessed will remain at 8.0 curies.

5. Amend the license to authorize use of DuPont Fe-55 source Model NER-462 to be used in the Lippke MV-FE device with a maximum activity of 100 mCi.

6. Amend the license to reduce the maximum activity of Amersham Fe-55 source Model IEC.D2 to be used in the Lippke MV-FE device to a maximum activity of 100 mCi.

7. a. Change the Lippke System Device Registration to reflect the name of the Distributor to be the same as in (1) above.

   b. Change the Manufacturer to be: Honeywell Paper Machine Automation Center GmbH
   Postfach 1760
   5450 Neuwied, Germany

   c. Add Types I, II and III to the Model designation.

   d. Change the text as indicated in the re-written attachment. These changes include adding materials other than paper or plastic to be measured, adding tungsten as an alternative shielding material to lead, adding density as a possible measurement, adding a fixed-type measurement in addition to a scanning type measurement, changing the positions of the shutter warning lamps, adding the possibility of manual cleaning of windows and some other small changes not significantly affecting the document. The addition of DuPont NER-462 Fe-55 source for use in MV-FE devices is also included as outlined below.

   e. The drawing on the previous registration is still valid and should not need to be changed.

   f. Add Model NER-462 Fe-55 source manufactured by E.I. DuPont de Nemours & Co. to the 'Sealed Source Model Designation'. The Amersham Model IEC.D2 Fe-55 source will remain. Both sources will be used interchangeably.

   g. Decrease the maximum activity Fe-55 source to 100 mCi from the current 400 mCi.

I have enclosed a copy of the NRC approval for the DuPont NER-462 source Honeywell wants to utilize in the Lippke System model MV-FE device. This sealed source is manufactured very similar to the existing Amersham IEC.D2 source and is a direct replacement which will be used interchangeably. The environmental conditions this source can be legally used in are much higher than the conditions device MV-FE is ever legally

placed in. This source has been utilized in this model device in Europe for several years with no failures of source integrity or leakage. The radiation profiles and the ANSI classification remain unchanged with the NER-462 source.

As agreed in our meeting at your office on March 18, 1993 and itemized in my letter to you dated March 22, 1993, Honeywell has taken the following actions to resolve the final issues concerning certain areas of non-compliance discovered in the Honeywell radiation safety program.

1. **Statistical Evaluation of Shutter Reliability**

A total of thirty six (36) devices have been distributed since Robin Process Management Systems received the initial Distribution License in 1984. A careful survey of our maintenance records shows that there have been a total of three (3) malfunctions of the shutter assembly. Two of these failures were on the Type I design, which is no longer manufactured except for upgrades or spare parts. The other failure was on a Type II design, which is also no longer manufactured except for upgrades or spare parts. There have been no failures of the current Type III design. Of the two failures on the Type I shutter, both occurred on separate installations, and both have since been removed from service; one was upgraded to a Type II shutter and the other removed entirely. The Type II shutter that failed was repaired and placed back in service and has not failed subsequently. In none of the cases did the shutter fail such that the beam was left in the "ON" position. All three failures resulted in the shutter simply refusing to open.

Based on a total of 3 shutter failures out of a total of 36 distributed, there has been a failure rate of 8.3% which sounds quite high. However, this is over a period of almost nine years. Most of the failures have been on the Type I shutter which is rapidly becoming obsolete. At the present time there are only 2 of the Type I shutters still installed at original customer sites. The rest have been removed from service permanently via upgrade to a Type II model, disposed of, or sold to another company. At the present time only one Type I shutter has been sold by the original owner. Based on the above analysis, I don't think a safety hazard exists concerning shutter failures.

2. **Organization Chart**

As you requested, please find attached an organization chart demonstrating that the Radiation Safety Officer (Gary Caines) does indeed report directly to Jay Corley, VP who is the top-ranking Honeywell executive in Georgia. This chart also indicates the overall management position of Jay Corley in the Industrial Automation & Control division of Honeywell, Inc.

3. **Depleted Radiation Sources**

Quotations are being received to dispose of the excess of depleted radiation sources currently in storage at Honeywell. These will be legally disposed of as quickly as possible.

Thank you very much for the help you and Bill Slocumb have been providing Honeywell. It is very much appreciated. If you have any further questions, please don't hesitate to contact me.

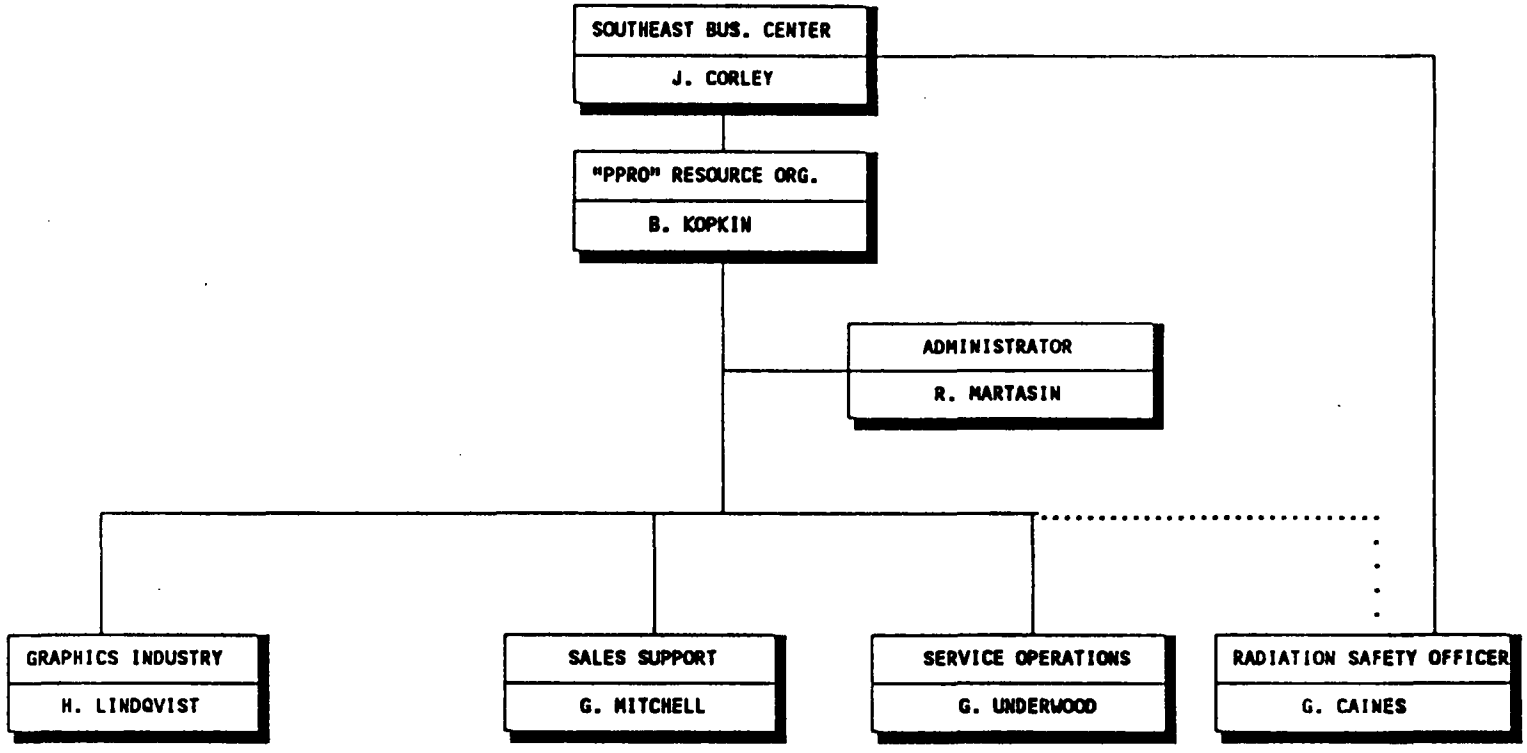
Sincerely,

Gary L Caines,
Radiation Safety Officer

Enclosures: Five

Copies: Jay Corley
Bill Slocumb

PULP AND PAPER
RESOURCE ORGANIZATION



G. CAINES

K. LAURILA

K. HYDE
B. PRUITT
B. COOK
M. SMALL
RFP0011742