



Betsy Ullrich, Senior Health Physicist  
USNRC Region I  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406  
610-337-5040 (office)  
240-704-4575 (cell)  
Elizabeth.ullrich@nrc.gov

03038931  
06-21253-03

REC'D 108 30 16 AM 07 13

Dear Betsy,

Thank you for your attention and your questions. On behalf of I2S, I want to make clear that I2S will not be distributing sources or otherwise be manufacturing any devices containing sources. Rather, I2S will be limited to on-site servicing of our prior installations where the sources will always remain contained within the assembly device.

Sincerely,

Frank Byus  
General Manager

REC'D IN LAT 8-30-16



Response to letter from Betsy Ullrich, USNRC Region I dated August 3, 2016

1. Item 6 of your application states that you plan to service gauges manufactured by I2S or LFE. We understand that some LFE gauges are now distributed by other manufacturers. Confirm if you are requesting authorization to service those gauges under successor manufacturer names.

Answer:

We will not be servicing gauges distributed by other successor manufacturers.

2. Item 6 also refers to the LFE Corporation Model SU-S3 thickness gauge. Please note that this gauge is no longer distributed by LFE Corporation. This model was since distributed by Eurotherm Gauging Systems Inc., then EGS Gauging Inc. and is currently authorized to be distributed by Thermo EGS Gauging Inc. The Model SU-S3 will be listed on your license under the currently authorized name, but you may service the Model SU-S3 under any of its former distributor names. Please confirm if you intended to request to provide training in the use only of the Model SU-S3, or other LFE/Eurotherm/EGS/Thermo EGS gauges as well.

Answer:

We will not be providing training in the use of SU-S3 devices distributed by LFE/Eurotherm/EGS/Thermo EGS.

3. Based on the information in your application, I understand that you will NOT be performing installation of sources into, or their removal from, the gauges. If my understanding is not correct, please inform me in writing, and provide procedures for installation of sources into the gauges, and removal of sources from the gauges.

Answer:

I2S will never be removing or installing sources (sources will always remain within their containment assembly). The source itself always remains in containment within the source head. We do remove and install the source assembly (the device) to do repairs on the gauge at the customer's site.



4. Confirm that, in addition to the training information provided in your application, your training for persons who will perform servicing of gauges will include the following:

- Successful completion of a written examination, with review of incorrect answers
- On-the-job training with supervised hands-on experience
- Practical examination consisting of an assessment by the RSO to ensure that each authorized user is qualified to work independently
- Discussion and/or drill on emergency procedures that may be required during field servicing of gauges.

Answer:

Yes, I2S will train personnel in servicing gauges. This training will include the items you listed above.

5. Confirm that training will be provided by qualified individuals such as those who currently meet the criteria for authorized users.

Answer: Yes, training will be provided by qualified individuals such as those who currently meet the criteria for authorized users.

6. Confirm that you will develop and implement procedures for obtaining an agreement with customers outlining the responsibilities of both the customer and service provider, when performing service operations at a customer's facility.

Answer: Yes, these procedures will be developed and implemented.

7. Confirm that you will develop instructions for to keep licensed materials under control and under immediate surveillance during use; control access to work sites; and for maintaining security during storage at customer facilities.

Answer: Yes, these procedures will be developed and implemented.

8. Confirm that you will develop and implement procedures for identifying and reporting to the NRC defects and noncompliance as required by 10 CFR 21.21(a).

Answer: Yes, these procedures will be developed and implemented.

9. Confirm that you will follow the manufacturer's procedures for inspection, maintenance, and operations that involve access to the sources and safety systems, if applicable.



Answer: We will, of course, adhere to the manufacturer's procedures and guidance, in that we were the manufacturer of these systems

10. Confirm that you will establish and manage a records system for radiation safety activities and records important for decommissioning.

Answer: Yes, we will establish and manage a records system.

11. The Emergency Guidance provided with your application does not include procedures and actions to be taken if a source ruptures, including actions to prevent the spread of contamination and minimize inhalation or ingestion of licensed materials. Confirm that your procedures for a leaking source or source rupture that causes contamination, although a rare occurrence, will provide instruction for controlling the area, preventing the spread of contamination, and minimizing inhalation or ingestion of the material.

Answer: Yes, we will provide procedures for controlling the area, preventing the spread of contamination, and minimizing inhalation or ingestion of the material.

12. The Emergency Guidance for some of the emergency types (contamination, stuck shutter, fall/collision, loss/theft, and fire) state to seek other professional assistance, such as the gauge manufacturer or another licensed service individual. Some of these procedures seem to be more appropriate for the gauge user, rather than a service provider. Confirm if these procedures define the limit of the services you intend to provide. If you will provide additional assistance gauge customers with these types of emergencies, describe any additional procedures or instructions to your authorized users.

Answer: We agree, these procedures are more appropriate for gauge users. The only services we intend to provide are repair services.

A handwritten signature in black ink, appearing to read "Craig Godwin".

Craig Godwin  
RSO, I2S LLC