

TN Technologies

A Thermo Instruments Company

November 29, 1995

Mr. Joel O. Lubenau
Office of Nuclear Material Safety and Safeguards
Mail Stop T-8F5
United States Nuclear Regulatory Commission
Washington D.C. 20555

Dear Mr. Lubenau and Working Group Members:

I recently reviewed the November 14, 1995, "Draft Minutes - NRC Working Group to Review Devices Containing Radioactive Materials." I have little additional comments to add to what was mentioned during the meeting. However, I wish to reiterate those areas I believe to be of most importance.

First let me say that the October meeting was very beneficial and informative for me as well as all parties involved. Due to scheduling conflicts, on my part, I will be unable to attend the December meeting and would appreciate being kept informed.

As I mentioned during the meeting (and as addressed on page 3 of the draft meeting minutes) it is important that Working Group (WG) not strictly focus on generally licensed (GL) gauges as being the primary or sole source of the scrap metal smeltings. There are many other devices which are both GL devices and specifically licensed that should be considered.

I concur with Dr. Paperiello's statement that "...whatever the solution will be, it will be a tough sell" - with regard to the potential additional regulatory efforts that may result based on recommendations of the WG. However, I firmly believe that regulatory agencies (federal and state) should strive to more effectively utilize existing avenues to address the entire issue of radioactive material accountability.

Specifically, initial efforts by government agencies should be to utilize manufacturer provided data (i.e., quarterly reports) combined with a more active inspection and enforcement program. I believe this to be a reasonable starting point without imposition of additional regulatory burden on the manufacturer.

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Attachment 14

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Those Agreement States which have had initiative to develop more aggressive general license rules, regulations, licensing, and inspection programs have shown tremendous progress in demonstrating accountability of GL devices and have valuable data that the NRC should consider. I encourage the NRC through the Office of State Programs to contact the Organization of Agreement States and the Conference of Radiation Control Program Directors for information and data collection.

For your information, the following is some statistical information:

**TN Technologies Inc.
General License Data**

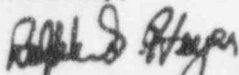
Number of GL records:	8449
100 mCi or less	7059
100 mCi < x < 500 mCi	626
500 mCi or more	764
Number of GL portable devices:	1089
Model 9266	658
Model 9277	388
Model 9290	43

Notes:

1. The above numbers are within plus or minus five percent accuracy.
2. "Record" is a record of a source and not necessarily of a device.
3. The above data is for the period of 1975 to present.

Should you have any questions or require additional information please advise. I can be contacted by telephone: 512/388-9287, fax: 512/388-9333, or Internet: RSHEYER@AOL.COM.

Sincerely,



Ralph S. Heyer, Manager
Regulatory Affairs