



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

APR 11 1985

MEMORANDUM FOR: John Hickey, Section Leader  
Industrial Licensing Section  
NMSS

FROM: William J. Adam, Ph.D., Senior  
Health Physicist/Licensing Reviewer  
Materials Licensing Section  
Region III

SUBJECT: TECHNICAL ASSISTANCE REQUEST: GENERAL  
DISTRIBUTION OF A FUEL DENSITOMETER

The enclosed amendment application (and accompanying manual dated 11/12/84) requests the NRC to amend License No. 22-19422-02G (Honeywell) to allow The Boeing Company (a general licensee) to redistribute, install and remove Honeywell fuel densitometers in the possession of various airlines. The request also asks that these various airlines be allowed to possess a stock of spare "emitters" and install and remove these emitters without the direct supervision of Honeywell or Boeing personnel. This subject has been addressed before with The Boeing Company in a letter from J. Hickey dated 3/29/84 (copy enclosed).

Region III suggests that The Boeing Company should apply for a redistribution license for two reasons:

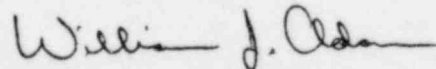
- a. Such an arrangement would involve the least amount of conflict with the requirements of Part 31 (i.e., there would be no distribution between two general licensees).
- b. Accountability would be more direct if Boeing were responsible for monitoring the distribution of these devices to its general license clients. Honeywell appears to suggest that it could effectively monitor the distribution of these devices to the various airlines through Boeing. This method seems less precise and we question to what extent Honeywell would monitor (if at all) the quality of the training provided by Boeing to the general licensees.

Honeywell has apparently taken the March 29, 1984 letter to The Boeing Company to mean that Boeings's desire to redistribute and relocate these devices could be satisfied by an amendment to the Honeywell license. Region III requests

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clarification as to whether Headquarters intended to suggest such an arrangement and, if so, whether such an arrangement would put the various airlines in noncompliance with 10 CFR 31.5(b) and The Boeing Company in non-compliance with 10 CFR 31.5(c)(8). If Headquarters agrees that the arrangement requested by the licensee (Honeywell) is feasible, Region III requests guidance regarding the resolution of the abovementioned conflicts and asks what procedures should be required of Honeywell to ensure sufficiently "strict control" (refer to NRC to Boeing Company letter dated 3/29/84) of the licensed material.

If such an arrangement is not considered feasible, we would appreciate any suggestions you wish to make regarding alternatives.



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Materials Licensing Section  
Region III

Enclosures:

1. Amendment Application  
dtd 11/15/84, Control No. 77823
2. Ltr J. Hickey to The Boeing Co.  
dtd 3/29/84
3. Technical Assistance Request  
Form

OK Bruce L. Hallitt  
4/11/85