

13 MAY 1987

License No. 37-21226-01  
Docket No. 030-20043  
Control No. 107037

Berthold Sys., Inc.  
ATTN: G. M. Smith, Jr.  
79 North Industrial Park  
Sewickley, Pennsylvania 15143

Gentlemen:

This is in reference to your request in a letter dated March 20, 1987 to amend License No. 37-21226-01. In order to continue our review, we need the following additional information:

- 1) It Item A of your letter, you request the current address to be revised. However, 79 North Industrial Park, Sewickley, Pennsylvania is the mailing address and place of use on Amendment No. 06, dated August 29, 1986, and the address specified on your letter head. Please clarify your request.
- 2) In item E. (1) of your letter, you request the General Licensee to perform wipe test and shutter operations tests. However, in Attachment V, you do not specify that each device will bear a label or separate statement of the requirements for collecting the wipe tests. Specifically, what areas are to be wiped, and the requirements for testing the on-off mechanism and indicator [10 CFR 32.51(a) (3) (i), (ii) & (iii)]. Please provide a copy of your label or information statement given to your customer indicating the six month frequency for performing both of these tests.
- 3) In item E. (3) of your letter, it is not clear why you are not surveying all six sides of the device or package and are requesting a five-point check. 49 CFR Part 173.441 requires a measurement be made on all of the external surfaces of the package. If you are only measuring 5 sides, please describe how you can certify that your Transportation Index will be the maximum radiation level at one meter from any external surface of the package.
- 4) In Attachment VI of your letter, you refer to the Transportation Index as the reading taken at 3 feet the surface in mr/hr. However, 49 CFR 173.411(bb) specifies the Transportation Index as the number expressing the maximum radiation level in millirem per hour at one meter (3.3 feet) from the external surface of the package. Please confirm that you will use the measurement made at a meter and not at 3 feet.

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- 5) In item E.(4) of your letter, you state that you do not require each customer who has a device distributed under a specific license to be trained by Berthold Systems personnel. Please note that the NRC requires that each specific licensee have personnel who are adequately trained and experienced in the type of material that they are soliciting prior to obtaining a license. Please confirm that you understood that if your customer does not have the training and experience and Berthold does not provide the training, that your customer will not obtain a license until they receive this training.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 107037.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely,

Original Signed By:  
Jack Davis

Jack Davis  
Nuclear Materials Safety Section B  
Division of Radiation Safety  
and Safeguards

Enclosure: 10 CFR Parts 30, 31, 32

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Davis/bc

RI:DRSS  
Glenn

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