



April 30, 1997

Hauni Richmond, Inc.
2800 Charles City Rd.
Richmond, VA 23231
Phone:
(804) 222-5255
Fax:
(804) 236-5212

Ms. Michele Burgess
Sealed Source Safety Section
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Device Registration Certificate (NR-0345-D-104-S)

Dear Ms. Burgess:

Regarding our discussion of Quality Assurance and Control, page 4 of the device certification, we request a modification to the statement pertaining to the distributor installing the device and performing an initial inspection.

We are concerned of Hauni Richmond's compliance as well our customer's compliance whereby our customer's having already been trained at our facilities in Hamburg are not accustomed to requesting additional support only for device installation and would object to the additional cost and interruption to the installation schedules.

Normally, the devices are shipped direct from Hamburg to the customer who performs the leak test and complete the accompanying radiation report and check list (see attachment). The records are maintained in a file for each device by the customer.

The first production lines, as well as devices, are always installed with Hauni assistance. However, subsequent deliveries may be installed without support from Hauni. Therefore, an individual from Hauni may not be on site nor requested to assist with the device installation.

Also, please consider devices ordered as designated spares to replace devices removed from the production machinery for maintenance. These devices are received and kept in storage until a need arises. When that need does arise it would be very unlikely that a technician from Hauni Richmond would be on-site.

As a result of these circumstances we would suggest the second paragraph to read as follows:

"The user will perform a leak test upon receipt. Hauni Richmond or persons specifically licensed will install the device and perform an initial inspection to verify that the appropriate device has been received, that the labeling is correct, and that the radiation levels around the device are in accordance with the information submitted in support of the application."

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PDR RC *
SSD PDR



A member of
the Körber Group



This would maintain the quality assurance requirement via our customers ongoing procedures without the cost or interference to always request additional manpower for device installation.


We are open to other suggestions whereby the quality control requirements are met, compliance of all parties is maintained without placing an undue burden on our customers.


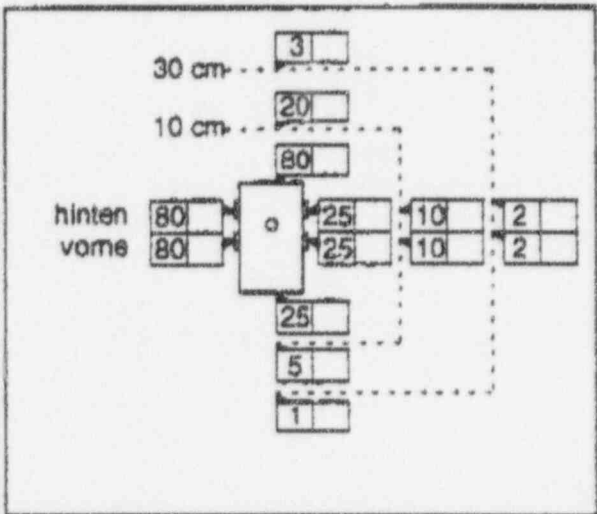
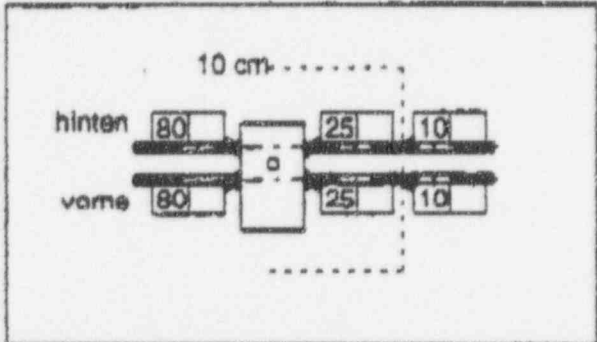
Sincerely,

A handwritten signature in dark ink, appearing to read "Darrell Basinger", written in a cursive style.


Darrell Basinger

DB/ac

 HAUNI	Test procedure and report Leakage radiation test	2522.01-64.00 1/3
Test equipment:	1. Adjustable compressed air supply 2. RFT 27060 X-ray/gamma dosimeter LB 1210 B contamination monitor 3. Two filter rods (approx. 30 cm) 4. Two outlet tubes	Test piece: Nuclear scanner Type : 2314-0-0-DS Serial no.:
<p>Passive nuclear scanner leakage radiation test without rod</p> <p>Preparatory work</p> <ul style="list-style-type: none"> • Compressed air supply not yet connected • Measuring tube empty • Indicator shows green • The two outlet tubes are fitted • The format parts are fitted <p>Measurement</p> <p>The RFT 27 060 X-ray/ gamma dosimeter is used to measure the leakage radiation in $\mu\text{Sv/h}$. The results are entered in the space provided on page 2 (upper diagram).</p> <p>Example: 10</p> <p>Active nuclear scanner leakage radiation test with rod</p> <p>Preparatory work</p> <ul style="list-style-type: none"> • Connect and switch on compressed air supply • The rod is inserted into the measuring tube until the tube is full. • Indicator should show yellow <p>Measurement</p> <p>The RFT 27 060 dosimeter is used to measure the leakage radiation in $\mu\text{Sv/h}$. The results are entered in the space provided on page 2 (lower diagram).</p> <p>Example: 20</p> <p>Results</p> <p>The nuclear scanner passes the leakage radiation test if the measured values are below the limit values.</p>		

	Prüfvorschrift und Prüfprotokoll Test Procedure and Report <i>Instructions de contrôle et protocole</i> <i>Instrucciones y protocolo de prueba</i>	2522.01-64.00 2/3
<div style="border: 1px solid black; padding: 5px; display: inline-block; margin-bottom: 20px;"> $\mu\text{Sv/h}$ </div> 		Typ : 2314-0-0-DS Type Type TipoS Ser.-Nr. : Ser. No. No. de série No. de serie
		
Prüfer: Examiner: Contrôleur: Examinador:	Vorgesetzter: Superior: Supérieur: Encargado:	Datum: Date: Date: Fecha:

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 HAUNI	Test procedure and report Wipe test	2522.01-64.00 3/3																																									
Test equipment:	1. Non-woven cloth (1 cm x 1 cm) 2. Tweezers (long) 3. Isopropanol 4. Plastic bag (15 cm x 10 cm) 5. LB 1210 B contamination monitor	Scanner :2314-0-0-DS Serial no. : Emitter no. : a _____ b _____																																									
Wipe Test <table style="width: 100%;"> <tr> <td style="width: 20%; vertical-align: top;">Test procedure</td> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> • The No. of the emitter is written on the plastic bag • The cloth is always handled with the tweezers • Cloth is moistened with isopropanol • Emitter glass is wiped over with the cloth • The cloth is placed in the plastic bag </td> <td style="width: 30%; vertical-align: top;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: center;">a</td> <td style="width: 10%; text-align: center;">✓</td> <td style="width: 80%;"></td> </tr> <tr> <td style="text-align: center;">b</td> <td style="text-align: center;">✓</td> <td></td> </tr> </table> </td> </tr> <tr> <td style="vertical-align: top;">Background radiation</td> <td style="vertical-align: top;"> Radiation is measured using contamination monitor LB 1210 B at a distance of 600 cm. 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Examiner:	Superior:	Date:																																									



NUCLEAR SCANNER TYP 2314-0-0DS NO.:		DATE:
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CHECKLIST FOR INSTALLATION OF HAUNI GAUGE EQUIPMENT

1.	Verification that the device shipped is the correct one by model and serial number identification.	
2.	Verify drawings in the manual with the actual device received to make sure that they match and that there are no structural alterations.	
3.	Check the leak test certificate that came with the source/device to assure that the test was performed within 6 months.	
4.	Make certain that all the required safety features are in place.	
5.	Verify that the label on the gauge device is clearly visible; check the type of source, source model/serial number, and the source strength all match the shipping papers.	
6.	Install the device on the manufacturing line and make sure that the device fits on the line properly.	
7.	Verify that the shutter controls work.	
8.	Verify that the radiation levels around the machine are within acceptable standards specified by regulation and licensure.	
9.	Verify that the electronics work and the signal is accurate, within range.	

HAUNI RICHMOND

Hauni Richmond, Inc.
2800 Charles City Road
Richmond, VA 231

To / An:	Nuclear Regulatory Commission	Telefax-No.:	
Attn. / Zu Händen:	Michelle Burgess	Date / Datum:	4.30.97
From / Absender:	Darrell Basinger	No. of Pages / Seitenanzahl:	6
For questions regarding contents please phone: Für telef. Rückfragen zum Inhalt:		Telefax Reply No. /Antwort über:	(804) 236-5212

Re: Device Certification # NR-0345-D-104-S

Dear Ms. Burgess,

The following is in regards to this morning's
conversation.

Sincerely,

Darrell Basinger

