

From: [Elliott, Robin](#)
To: [Williams, Anthony S CAPT USN CNO \(USA\)](#)
Cc: [Fragoso, Lino L CIV OPNAV, N45 \(lino.fragoso@navy.mil\)](#); [Abkemeier, Erik J CIV \(US\)](#)
Subject: Request for Additional Information
Date: Thursday, July 30, 2020 11:34:00 AM

License No.: 45-23645-01NA

Docket No: 030-29462

Control No: 621120

Licensee Name: Department of the Navy

This refers to your request dated May 22, 2020, for an exemption from 10 CFR 34.25(b)(2) to extend the calibration frequency of gamma radiography survey instruments from 6 months to 12 months. In order to continue our review of your request, the following additional information is needed:

1. Please provide the supporting data that lead to the conclusion obtained regarding the calibration fail rate. In addition, provide a statement as to why you believe the "as found" condition typically does not change; such as a care and use procedure that provides better reliability for your instruments, or that your instruments are constructed better than the commercially available ones and why, etc.
2. Provide more detail regarding the resource savings by implementing the exemption as well as the reduction in radiation exposure to calibration technicians; i.e. percent reduction in staffing/exposure.
3. Please provide the basis for the following statements:
 - a. "that this is in the best interest of national security," and
 - b. "that this poses no undue risk to the public."
4. Please describe your instrument response check procedures for linear, logarithmic, and digital survey meters.
5. Do you have any data that suggests that an instrument that responds properly to a response check will reliably respond to a calibration check?
6. Do you plan on employing any compensatory measures when using a survey instrument that has exceeded a calibration date of 6-months (e.g., use of multiple survey instruments, use of additional alarming dosimeters, or more rigorous instrument response checks)?
7. Do you have any data that characterizes why radiation survey instruments fail (e.g., dirt and debris intrusion, mechanical damage, battery failure, corroded electronics, etc.?).
8. You made a statement that, "Radiography operations conducted by Navy radiographers are safer than that of the commercial industry." Please provide the following additional information to support that claim:
 - a. a summary of the incidents that the Navy has recorded in their gamma radiography program over the past ten years;
 - b. information regarding the types of safety and security drills that are performed, the length of the drill, persons involved, accident scenarios, etcetera;
 - c. data that demonstrates that self-reporting of problems that require stopping of work is different within the Navy than in commercial radiographic activities in the USA; and
 - d. a basis and data, if available, to support the statement that Navy work areas are extremely clean compared to commercial radiography sites.
9. Describe the basis for determining that survey instruments have a lengthy track record of stability, and the basis for believing that the Navy instruments are significantly different than those used in commercial radiography in the USA. Provide the programs used for maintenance, processing and calibration and the policy used for replacement.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email (preferred method during this public health emergency); or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. Please provide your response within 14 calendar days from the date of this e-mail so we can complete this action in a timely manner. Please feel free to call me with

any questions you may have.

Regards,

Robin L. Elliott
Health Physicist
Medical & Licensing Assistance Branch
Division of Nuclear Materials
U.S. NRC, Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
(610) 337-5076 voice
(610) 337-5269 fax
Robin.Elliott@nrc.gov