

From: [Cheryl Nitkowski -MDE-](#)
To: [Beardsley, Michelle](#)
Subject: [External_Sender] Re: +/- max limits
Date: Tuesday, August 10, 2021 4:00:19 PM

Hi Michelle;

In response to your questions:

1. This condition is only for industrial radiography licenses. In sentence number 1, Co-60 was omitted. Both Ir-192 and Co-60 are used in industrial radiography cameras. This condition is not included in a medical license.
2. Please see page 8-12 of NUREG 1556 Vol. 13 Rev.2. This condition is also supported by the Federal Food Drug and Cosmetic Act- Title 21 of the FDA.
3. C.31 corresponds to 10 CFR 30.34
C.32 corresponds to 10 CFR 30.36

Let me know if we can be of further assistance.

Respectfully,

Cheryl

On Tue, Aug 10, 2021 at 2:26 PM Beardsley, Michelle <Michelle.Beardsley@nrc.gov> wrote:

Thanks Cheryl. Three more questions:

1. I notice that this condition (no. 6) refers to Ir-192 in the first sentence, but then includes Co-60 in 6.a.; also it seems to apply to medical licenses, but then in 6.c. it is referring to industrial radiography licenses. Is this condition put on both medical and industrial radiography licenses?
2. You reference C.28(k)(5) in your justification for LC no. 1; what NRC regulation is this equivalent to? Can you please submit a copy of this regulation?
3. The same for C.31 and C.32 mentioned in your justification for LC no. 4; equivalent to which NRC regulations? Please submit a copy.

Thanks for your help in this matter,

-Michelle

From: Cheryl Nitkowski -MDE- <cheryl.nitkowski@maryland.gov>
Sent: Tuesday, August 10, 2021 12:20 PM
To: Beardsley, Michelle <Michelle.Beardsley@nrc.gov>
Subject: [External_Sender] +/- max limits

Good afternoon, Michelle;

I believe that previous RHP management allowed for a small amount of activity over the max limit to allow for decay during shipping from the manufacturer to the licensee.

Ir-192 has a 75 day half life. So, if the sealed source was shipped from overseas, it could take over a week to arrive in the USA. To ensure the sealed source arrived at the licensee's facility with the activity amount that licensee had paid for, the manufacturer may have slightly increased the activity amount prior to shipment.

I hope this helps clarify.

Thank you for your inquiry.

Respectfully,

Cheryl

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