May 14, 2013

DEP INFORMATION NOTICE 2013-03:  PENDING EXPIRATION OF THE NRC TYPE B TRANSPORTATION PACKAGE CERTIFICATE FOR SENTINEL™ MODEL 660 SERIES RADIOGRAPHIC PROJECTORS ON JUNE 30, 2013

ADDRESSEES

All Pennsylvania Department of Environmental Protection (DEP) specific radiography licensees.

PURPOSE

The DEP is issuing this Information Notice (IN) to alert licensees to the June 30, 2013 expiration of the Certificate of Compliance (CoC) No. 9283 for the SENTINEL™ Model 660 Series radiographic projectors. It is expected licensees will review this information for applicability to their inventories and consider preparatory measures, as appropriate. This notice is based on NRC Information Notice 2013-08, issued May 2, 2013 (attached).

DESCRIPTION OF CIRCUMSTANCES

QSA Global, Inc. notified its customers in August 2009 that it does not intend on renewing the CoC for the Model 660 Series of radiographic projectors and that the Type B(U) CoC No. 9283 will expire on June 30, 2013. Along these lines QSA also indicated that their Type A package certification will lapse on the same date. Several factors were offered for this decision: "S" tube wear, age of the units, resources required to manufacturer replacement parts, and the inability to meet the ISO 3999-1 2000E standard.

DISCUSSION

As specified in the regulations, a valid certificate must be in place to allow legal transport in accordance with international and US regulations. Once a certificate expires, the package cannot be transported legally. Users may continue to use the package as normal until June 30, 2013. On July 1, 2013 the Model 660 Series will no longer be an NRC-authorized transportation package. The following models will then need another approved package to transport the 660 Series radiography sources: 660, 660A, 660B, 660E, 660AE, and 660BE.

After June 30, 2013 licensees must use a certified Type B overpack container to lawfully transport the projectors containing a radiography source inside. Also, the 660 Series device incorporates depleted uranium for shielding, therefore even without a source inside, the device must still meet transportation requirements for a manufactured article containing depleted uranium.
Licensees are encouraged to evaluate their programs for the best option for regulatory compliance regarding transporting the 660 Series projectors. This is not limited to, but may include making final disposition of any devices in their possession prior to June 30, 2013.

Licensees are reminded that changes in material possessed under their Pennsylvania radioactive materials license shall require an amendment to remain in compliance with current regulations.

CONTACTS

This Information Notice requires no specific licensee action or response. If you have any questions about the information in this notice, please contact the Radiation Control Division at 717-787-3720.

Issued by
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Director

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Attachment: NRC INFORMATION NOTICE 2013-08: PENDING EXPIRATION OF THE NRC TYPE B TRANSPORTATION PACKAGE CERTIFICATE FOR SENTINEL™ MODEL 660 SERIES RADIOGRAPHIC PROJECTORS ON JUNE 30, 2013
NRC INFORMATION NOTICE 2013-08: PENDING EXPIRATION OF THE NRC TYPE B TRANSPORTATION PACKAGE CERTIFICATE FOR SENTINEL™ MODEL 660 SERIES RADIOGRAPHIC PROJECTORS ON JUNE 30, 2013

ADDRESSEES

All holders of radiography licenses for SENTINEL™ Model 660 Series radiographic projectors. All Radiation Control Program Directors and State Liaison Officers.

PURPOSE

The U.S. Nuclear Regulatory Commission (NRC) is issuing this Information Notice (IN) to alert addressees to the June 30, 2013, expiration of Certificate of Compliance (CoC) No. 9283 for the SENTINEL™ Model 660 Series radiographic projectors. It is expected that recipients will review the information for applicability to their facilities and consider other arrangements, as appropriate. The NRC is providing this IN to the Agreement States for their information and for distribution to their radiography licensees, as appropriate.

DESCRIPTION OF CIRCUMSTANCES

In August 2009, QSA Global, Inc. (QSA) notified its customers that it does not intend to renew the CoC (for NRC Package Identification No. USA/9283/B(U)-96) for the Model 660 Series of radiographic projectors and that the Type B(U) CoC No. 9283 will expire on June 30, 2013 (as stated on Condition No. 11 of the CoC). QSA also indicated that their Type A package certification will lapse on the same day.

QSA offered several factors for its business decision: "S" Tube wear, age of the units, resources required to manufacture replacement parts and maintain documentation, and the inability to meet the ISO 3999-1 2000E standard.
BACKGROUND

As specified in the regulations, once a certification expires, the package cannot be shipped or transported legally. A valid certificate must be in place to allow legal transport in accordance with international and United States regulations.

DISCUSSION

Users may continue to use the package in accordance with the CoC until June 30, 2013. Users of the package should specifically note Condition 8(c) of the CoC which states that "No service operations shall include the replacement of the shell, of the depleted uranium shield, or any shell weld repair." The safety evaluation report details the reasons for condition 8(c). In particular, the model is no longer manufactured (as of 2001) and QSA confirmed that it was not willing to repair or replace the shell on packages currently in use or repair welds.

On July 1, 2013, the Model 660 Series device will no longer be an NRC-authorized transportation package. On this date, an approved package other than the Model 660 Series must be used for transport of the 660 Series radiography sources. This applies to the following models: 660, 660E, 660A, 660AE, 660B, and 660BE.

After June 30, 2013, a certified Type B container (overpack) may be used to lawfully transport the projectors containing a radiography source inside. If licensees have a need to transport 660 Series radiography projectors containing a radiography source inside after June 30, 2013, without a certified Type B container (overpack) they may request that the NRC approve a limited number of shipments pursuant to 10 CFR 71.17(a). These approvals are issued on a limited basis to address unique situations. The Model 660 Series device incorporates depleted uranium for shielding; therefore, even without a radiography source inside, the device must meet the transportation requirements for a manufactured article containing depleted uranium.

Users are encouraged evaluate their program to identify the best option for them to be in compliance with NRC regulations regarding transport of the 660 Series radiography projectors with or without radiography sources. These options include making arrangements for final disposition of the 660 Series radiography devices in their possession prior to the June 30, 2013, expiration date. However, per 10 CFR 71.5(a), the projectors may still be used at an NRC or Agreement State-licensed site provided that they are not moved while containing a radiography source without a certified overpack.

If users dispose of the current radiography projector or obtain a radiography projector that has a current CoC, they should be aware that changes in material held under its license may require changes to its possession and use licenses issued by the NRC or an Agreement State.
CONTACT

This IN requires no specific action nor written response. If you have any questions about the information in this notice, please contact the technical contacts listed below or the appropriate regional office.

/RA Eric Benner for/                      /RA/  
Mark D. Lombard, Director                  Brian J. McDermott, Director
Division of Spent Fuel Storage            Division of Materials Safety
and Transportation                        and State Agreements
Office of Nuclear Material Safety         Office of Federal and State Materials
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Enclosure: List of Recently Issued FSME Generic Communications