

February 7, 2000

ALL AGREEMENT STATES  
MINNESOTA, OKLAHOMA, PENNSYLVANIA AND WISCONSIN

**PROGRAM MANAGEMENT INFORMATION: UPDATING SEALED SOURCES  
AND DEVICES (SS&D) CERTIFICATES (SP-00-010)**

Based on review of recent inspection, enforcement and investigative information, we would like to inform you of an issue having possible generic implications to our respective programs for evaluation of sealed sources and devices (SS&D). It deals with the need to ensure that the sealed source and device registration certificate is reviewed and updated when amendments or modifications to an existing sealed source and device are approved. Recently, a situation occurred where a vendor submitted a request for approval of a modified source. The change was reviewed and approved, and the change was incorporated by reference into the current registration certificate. However, although the new source information was incorporated by reference, the certificate was not explicitly amended to specifically identify the new source model and serial numbers in the registration certificate. Consequently, an inspector identified this as a non-compliance item during a routine inspection of a licensee which had received the new source.

The incorporation of information by reference in a device registry certificate without a corresponding change to the registration certificate incorporating the new information can lead to confusion on the part of users, the Nuclear Regulatory Commission (NRC), and Agreement State regulatory programs. As in the situation cited above, NRC and other Agreement State regulatory programs would likely not be aware of the approved changes to the source or device and would not be able to confirm new approved source model or serial number references with those being used by the vendor. Such a situation could also result in licensees receiving sources that they are not authorized to receive placing them in non-compliance with their license authorizations.

We would appreciate your attention to this matter. If you have any questions regarding this letter, please contact the individual named below.

POINTS OF CONTACT: Cardelia H. Maupin INTERNET: CHM@NRC.GOV  
TELEPHONE: (301) 415-2312 FAX: (301) 412-3502

**/RA/**

Frederick C. Combs, Deputy Director  
Office of State Programs

February 7, 2000

**PROGRAM MANAGEMENT INFORMATION: UPDATING SEALED SOURCES  
 AND DEVICES (SS&D) CERTIFICATES (SP-00-010)**

Based on review of recent inspection, enforcement and investigative information, we would like to inform you of an issue having possible generic implications to our respective programs for evaluation of sealed sources and devices (SS&D). It deals with the need to ensure that the sealed source and device registration certificate is reviewed and updated when amendments or modifications to an existing sealed source and device are approved. Recently, a situation occurred where a vendor submitted a request for approval of a modified source. The change was reviewed and approved, and the change was incorporated by reference into the current registration certificate. However, although the new source information was incorporated by reference, the certificate was not explicitly amended to specifically identify the new source model and serial numbers in the registration certificate. Consequently, an inspector identified this as a non-compliance item during a routine inspection of a licensee which had received the new source.

The incorporation of information by reference in a device registry certificate without a corresponding change to the registration certificate incorporating the new information can lead to confusion on the part of users, the Nuclear Regulatory Commission (NRC), and Agreement State regulatory programs. As in the situation cited above, NRC and other Agreement State regulatory programs would likely not be aware of the approved changes to the source or device and would not be able to confirm new approved source model or serial number references with those being used by the vendor. Such a situation could also result in licensees receiving sources that they are not authorized to receive placing them in non-compliance with their license authorizations.

We would appreciate your attention to this matter. If you have any questions regarding this letter, please contact the individual named below.

POINTS OF CONTACT: Cardelia H. Maupin INTERNET: CHM@NRC.GOV  
 TELEPHONE: (301) 415-2312 FAX: (301) 412-3502

*/RA/*  
 Frederick C. Combs, Deputy Director  
 Office of State Programs

Distribution:  
 DIR RF DCD (SP03) PDR (YES\_√\_, NO\_\_\_\_)  
 SDroggitis  
 Agreement State File

**DOCUMENT NAME: C:\ISP-00-010.WPD**

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	OSP		IMNS:D		OSP:DD				
NAME	CHMaupin:gd		DCool		FCCombs				
DATE	01/19/00		01/31/00		01/21/00				

**OSP FILE CODE: SP-A-4**