



CPN – InstroTek
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MEMORANDUM

To: CPN Nuclear Gauge Owners and Distributors

From: Sean Reilly, Radiation Safety Officer / CPN, Div. of InstroTek

Date: Revised and Updated October 30, 2013 (Supercedes 10/12/06 and 11/28/06 memo)

Re: Discontinued Special Form Certificates

The current special form certificates for the sealed sources in CPN gauges no longer cover sources manufactured before the dates indicated on the attached information letters from the source manufacturer. The certificates for sources manufactured before these dates are discontinued. Your gauges' source dates are imprinted on the metal label on the gauge shell and shipping container. The gauge models affected are all BR(C) and Mark II gauges, and some MC-1 and MC-2 gauges. The MC-1DRP and MC-3 gauges should not be affected by these discontinued certificates unless they contain re-used sources manufactured before the validity dates shown.

Sources that are not certified as special form cannot be transported in their Type A packages by vehicle on roadways in compliance with the U.S. Department of Transportation (USDOT) hazardous materials regulations.

To resolve this problem, CPN was granted Special Permit No. DOT-SP 14329 by the USDOT. This permit authorizes the one-time transport of gauges with discontinued special form certificates, to CPN-InstroTek for disposal purposes.

Most (but not all) of the gauges with sources manufactured before the validity dates are no longer in use – they are 32 years old. If you have these older gauges, your options are as follows:

1. Keep the gauge in your permanent storage location and follow the conditions of your radioactive materials license. You are at risk of non-compliance with USDOT regulations if you continue to transport them to and from field test locations, or to another branch office or licensee. By regulation, a CPN/InstroTek authorized service center cannot return one of these gauges to you.
2. Contact CPN/InstroTek –Concord for your gauge source disposal options. Either paid source recovery and disposal fees are due, or they are waived with the purchase of a new gauge. (New source replacement in a 24 year-old gauge is not recommended). You will be issued a Return Authorization Number (RA#) and instructed to mark the package of a returned gauge "DOT-SP 14329" with letters and numerals at least 1" (2.5 cm) high. CPN will file your name and record of use of the permit with the USDOT.

Contact CPN-InstroTek if you have any questions regarding this regulatory policy.

AEA Technology
QSA Inc.
40 North Avenue
Burlington, MA 01803
Telephone (781) 272-2000
Telephone (800) 815-1383
Facsimile (781) 273-2216

AEA Technology QSA, Inc. Regulatory/Health Physics Department - Burlington, MA

Information regarding Special Form Certificate USA/0634/S for Capsule Codes X8
Cs-137 source in all CPN gauges

Special Form certificate GB/24/S-85 for the X8 capsule will lapse at the end of October 2003. All sources that were approved as Special Form Radioactive Material after 23 September 1981 by Special Form Certificate GB/24/S-85 are now approved as special form based on the new USA certificate USA/0634/S. This certificate is special form approved to IAEA TS-R-1 requirements.


Product Licensing Specialist

28 Aug 03
Date

Quality and Safety Assurance

Information regarding Special Form Certificate USA/0670/S for Capsule Code X220

Am-241/Be source in all CPN gauges

Special Form certificate GB/113/S-85 for the X220 will lapse at the end of April 2004. All products that were previously approved as Special Form Radioactive Material by Special Form certificate GB/113/S-85 are now approved by Special Form certificate USA/0670/S.

Important note:

ONLY X220 capsules that were manufactured on or after 1st April 1981 and conform to the requirements of the Special Form Material certificate USA/0670/S are approved as Special Form Radioactive Material.

Mark Shepperson

26th April 2004

Return Instructions: Gauges with Discontinued Source Certificates

The sealed source capsule(s) must have passed a current satisfactory leak test in accordance with U.S. Nuclear Regulatory Commission or Agreement State license conditions.

This special permit only authorizes one-time transportation for source disposal purposes only.

SPECIAL PROVISIONS:

(attached)

a. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.

b. Each package must be conspicuously marked "DOT-SP 14329" with letters and numerals at least 1" (2.5 cm) high.

c. Persons offering hazardous materials under this special permit must be on file (organization, address, telephone number, and email address optional) with PHMSA's Office of Hazardous Materials Special Permits and Approvals. The filings may be provided by either the consignor or consignee. Filings must be provided to the Office of Hazardous Materials Special Permits and Approvals, Pipeline and Hazardous Materials Safety Administration., U.S. Department of Transportation, 400 7th Street, SW, Washington, D.C. 20590-0001, Attention: PHH-31; or by email to specialpermits@dot.gov.

MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle and cargo aircraft only.

* CPN will provide filings of permit use to the USDOT.



U.S. Department
of Transportation

East Building, PHH – 30
1200 New Jersey Avenue, Southeast
Washington, D.C. 20590

**Pipeline and Hazardous
Materials Safety Administration**

SPECIAL PERMIT AUTHORIZATION

DOT-SP 14329

EXPIRATION DATE: November 30, 2016

GRANTEE: CPN International, Inc.
Concord, CA

In response to your September 10, 2012 application for renewal of DOT-SP 14329, the grantee status to DOT-SP 14329 for CPN International, Inc. is hereby renewed in accordance with 49 CFR § 107.109 as a shipper only.

Copies of this special permit may be obtained by accessing the Office of Hazardous Materials Safety Homepage at http://hazmat.dot.gov/sp_app/special_permits/spec_perm_index.htm. The most recent revision of the special permit supersedes all previous revisions of the special permit. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

If you have questions regarding this action please call the Office of Hazardous Materials Special Permits and Approvals at (202) 366-4535.

Issued in Washington D.C. on **February 28, 2013**.

for Dr. Magdy El-Sibaie
Associate Administrator for Hazardous Materials Safety