TANDARD FORM NO. 64

## Office Memorandum . UNITED STATES GOVERNMENT

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: Division of Licensing and Regulation<sub>Signed</sub>

Assistant Director for Compliance, M. M. Mann

DATE

FROM : Division of Inspection

SUBJECT: SYMBOL: IN

INS : COP

Director,

Information gathered during inspection of the subject licensee shows noncompliance with AEC regulations (or license provisions) as set out in the enclosures.

It is suggested that a letter be addressed to the licensee to inform him of the noncompliance items and request that appropriate action be taken to correct or overcome these deficiencies. When corrective action has been completed on this matter, please furnish **IN Inspection Division** with copies of pertinent correspondence (to and from the licensee) and these items will be reviewed during the next regular

A summary of this case will be included in the ortober report to the Office of the General Manager.

A copy of this memorandum and the enclosure have been furnished the Office of the General Counsel.

Enclosure:

Cpy rpt dtd 9-25-58 Cpy trans meno fa R.W.Kirkman, NY to M.M. Mann, dtd 9-29-58

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ITEM #

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Marvin H. Mann, Assistant Director Division of Inspection, Headquarters

Bobert W. Kistenn, Ekrester, Inspection Digisten, MICO Characteril of ISCENE COMPLIANCE INSPECTED NOPORT - 34 48 30 Statistics

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Transmitted horewith is the following inspection report involving noncompliance:

> National Research Corporation Physics Department 70 Memorial Drive Cambridge, Massachusetts

Mcense Nos. 20-1465-1 and -3

The following items of noncompliance were noted during this inspection:

License 20-1465-1

20.20) "Caution Signs, Labels, and Signals"

(f)(4) "Containers" - in that the brass unit containing two 160 millicurie Krypton 85 scaled sources, although labeled with the sign "Radiosctive - Avoid Unnecessary Handling" and having the prescribed symbol, lacked the prescribed sign "Caution - Radioactive Material" and failed to show kind, quantity, and date of measurement of the quantity of licensed material it contained. (See paragraph 16 of report details.)

#### Ideana 20-1465-3

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(a)(1) "Additional Requirements" - in that the area (therease exhinet) and the storage room where curis mounts of Mandand material were being stored, although posted with a dire would "Danger - Redicectivity" and having the presented symbol, lacked the prescribed sign "Caution - Redicective Material". (See paragraph 16 of report details.)

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9 4 preseribed sign "Caution - Radioactive Material". graph 16 of report details.) and of measurement of the quantity it P Dolla-E

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 sign and symbol and failed to show kind, quantity, and date of measurement of quantity of licensed material they contained. each containing 250 milliouries or greater of zirconium er titanium triteride foil were not labeled with radiatien caution (f)(4) "Containers" - in that storage jars "C", "D", "E", and "F",

measurement of quantity of material it contained. 16 of report details.) sireonium triteride feil was not labeled with redistion eaution sign and symbol and failed to show kind, quantity, and date of measurement of quantity of material it contained. (See paragraph - in that a storage jar containing 7 ouries of titanium or sirconium triteride feil was not labeled with radiation caution

30.3 "Ifoense Requirements"

of titanium or sirconium triteride foil was demonstrated in Pittsburgh, Pennsylvania, at the Hine Safety Corporation. paragraph 10, license -3, of report datails.) in that the completed piece of equipment containing one ourie (See

## Condition 15

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Marvin K. Mann

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citations 20.203(e)(1), (f)(1), (f)(4) and 30.3. He added that he would wait until hearing from DLAR with respect to the distion concerning condition 13, pince there was a w The streaten-titanius withdie fall a mailed or second of second

Innernet er the Alexan of attrictions Motors a plant in Allier-up Astriction is recommend alexant is and to Alexand (1)(1) under the Alexant is accompliance, 20,203 (2)(1) under the inter of accompliance, 20,203 (2)(1) under the and inner listed above do **tit**te thet. and a set of the set o sting s- 14 se si 🕅 confirmation that the ite and (f)(4) under license -3, have been corrected and requesting that item of noncompliance 30.3 be corrected.

> With regard to citation for condition 15 of license -3, it is believed that the zirconiun-titanium triteride fails are not sealed sources. Therefore, we recommend that the license -3 be amended by listing the chemical or physical form under Item 7 as being titanium or zirconium triteride foil and by deleting conditions 15 and 16.

> It should be noted that the licenses (license -1) has not been aited for possessing two 160 millicurie Kr sealed sources designed and mounted as per drawing Model LAB-519 rather than one 400 millicurie Kr<sup>55</sup> source designed and mounted as per drawing Hodel LAB-1972, in that this office has neither drawing and does not know whether any difference exists.

> It should also be noted that the licenses has not been cited for failure to comply with condition 16 of license -3, in that it is our belief that the sirconium-titanium triteride are not sealed sources. Therefore, cutting of them does not constitute a violation.

> Please note that the NRC Equipment Corporation of Newton Highlands, Massachusetts, was not inspected, in that manufacturing of equipment using the lipensed material has not begun as yet. being performed was guite Minited and being wood beller is at the Cashridge Messarch Division.

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If additional space is required for any numbered item above, the continuation may be extended to the reverse of this form using foot to head format, leaving sufficient margin at top for binding, identifying each item by number and noting. "Continued" on the face of form under appropriate item.

RECOMMENDATIONS SHOULD BE SET FORTH IN A SEPARATE COVERING MEMORANDUM

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Number

20-1465-3

(Cont'd)

Date

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Exp. Date

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#### Scope and Conditions

Scope (Cont'd) 200 sources not to exceed 1 curie each total 200 curies of Hydrogen 3. as U.S. Radium Corp. sealed sources Model LAB-507; both to be used as ionization sources in vacuum gauges, gas analyters and other instruments involving production of excited er ionized gas as principle of

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Conditions: flo-Unless otherwise specified, the authorized place of use is the licensee's address at #9 Memorial Drive, Cambridge, Massachusetts. #11-Byproduct material may also be used at MRD Equipment Corporation, 160 Charlemont St., Newton Highlands, Massachusetts. fl2-The licensee shall comply with the provisions of Title 10, Part 20, Code of Federal Regulations, Chapter 1, "Standards for Protection Against Radiation". #13-Byproduct material shall be used by, or under the supervision of, Dr. G. Frederick Vanderschmidt. #14-This license supersedes License No. 20-1465-2 issued July 25, 1957. #15-Byproduct material as sealed sources shall be encapsulated prior to possession by the licensee. #16-Byproduct material as sealed sources shall not be opened. #17-Total amount of Hydrogen 3 (tritium) acquired under this license shall not exceed 5,000 curies. #18-Hydrogen 3 prooured under this license will be shipped direct from supplier to manufacturer of sources listed, U. S. Radium Corp. or Radiation Research Corp.

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#### ITEM 6 CONT'D

sealed sources, although labeled with the sign "Radicactive - Avoid Unnecessary Handling" and having the prescribed symbol, lacked the prescribed sign "Gaution -Radicagtive Haterial" and failed to show kind, quantity, and date of missurement of the quantity of licensed material it contained. (See paragraph 16 of report details.)

#### Ligense 20-1465-3

#### 20.203 "Caution Signs, Labels, and Signals"

(e)(1) "Additional Requirements" - in that the area (storage cabinet) and the storage room where curie amounts of licensed material were being stored, although posted with a sign worded "Danger - Radioactivity" and having the prescribed symbol, lacked the prescribed sign "Caution - Radioactive Material", (See paragraph 16 of report details.)

(f)(1) "Containers" - in that four storage jars, each containing 100 millicuries or greater of zirconium or titanium triteride foil, although tagged with the sign "Danger - Radioactivity" and having the prescribed symbol and showing the kind, quantity, and date of measurement of the quantity of licensed material each jar contained, lacked the prescribed sign "Caution - Radioactive Material". 20,203 "Caution Signs, Labels, and Signals"

(f)(1) "Containers" - in that one tritium mounted foil totaling one curie, although tagged with a sign worded "Danger - Radioactivity" and having the prescribed symbol and showing the kind, quantity, and date of measurement of the quantity it contained, lacked the prescribed sign "Caution -Radioactive Esterial". (See paragraph 16 of report details.)

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(1)(4) "Containers" - in that storage jars "C", "D", "E", and "F", each containing 250 milliouries or greater of micronium or titanium triteride foil were not labeled with radiation coution sign and symbol and failed to show kind, quantity, and date of measurement of quantity of licensed material they contained.

- in that a starage jar containing 7 suries of titanism or strongism triteride foil was not labeled with rediation caution sign and symbol and failed to show kind, quantity, and date of measurement of quantity of material fit contained. (See paragraph 16 of report details.)

#### 30.3 "License Requirements"

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- in that the completed piece of equipment containing one curie of titanium or sirconium triteride foil was demonstrated in Pittsburgh, Pennsylvania, at the Mine Safety Corporation. (See paragraph 10, license -3, of report details.)

#### Condition 15

- in that zirconium-titanium triteride foil was not encapsulated prior to possession by the licensee. (See paragraph 10, license -3, of report details.)

#### PART 30 INSPECTION

National Research Corporation Applied Physics Section 70 Memorial Drive Cambridge, Massachusetts

Date of Inspection: July 10, 1958

#### Persons Accompanying Inspector:

None.

#### Persons Contacted:

#### Dr. G. Yanderschmidt, Physicist Mr. J. R. Reehrig, Menior Physicist

#### 9. Organisation and Administration

The National Research Corporation at Cambridge, Massachusetts, is primarily interested in the development and production of rare metals. The Applied Physics Section, the only users of the licensed material, is concerned with developing the products and processes for manufacture by the NRC Equipment Corporation at Newton Highlands.

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Vanderschmidt, the only user of the titanium and zirconium triteride foil, is responsible for all projects using the material as well as inventory. Rochrig has been the only user of the Krypton 85 sealed sources. The Radiological Safety Committee, under the chairmanship of Dr. J. C. Simmons, Director of Applied Physics Department, approves proposed programs involving radioactive materials, inspects periodic survey results of facilities, and reviews procedures. Vanderschmidt stated that the committee meets approximately once a month and that minutes are kept. He reported that the committee was made up of the following members:

> Dr. J. C. Simmons, Chairman Dr. A. W. Winston, Radiation Safety Officer Mr. J.V.E. Hansen, Business Manager Mr. C. F. Taylor, Personnel Manager Dr. Wayne Keller, Chemist Dr. Sealer, Toxicology Consultant

Vanderschnidt stated that although the NRC Equipment Corporation at Newton Highlands had a separate Radiological Safety Coumittee under the chairmanship of Mr. F. Torney, Section Head, both plants have the same radiation safety officer who is responsible for the radiological safety at both locations, namely, Dr. Minston. Vanderschmidt said that the R.S.O.'s specific duties consisted of educating personnel in radiological safety, making periodic checks to insure compliance with approved procedures, reviewing weekly film badge reports, and maintaining records.

Vanderschmidt's training and experience consisted of no formal courses in radicisotopes other than that received at N.I.T. in experimental melear physics. He added that while at M.I.T. he had used Cobalt 60 and radium as ionizing sources and had used tritium, krypton, and radium during on-the-job training at the National Research Corporation.

Kochrig's training and experience have included no formal courses in radiological safety but on-the-job training for a period of five years at National Research Corporation, using radium and Krypton 85.

Winston's training and experience in radiological safety consisted of both formal courses at M.I.T. and on-the-job training at Schlumberger Well Survey Corporation. Vanderschmidt stated that Winston attended a Tracerlab course in radioisotope handling and during the period of 1956-57 was Radiological Consultant for the City of Houston, where he organized and taught courses in radiological monitoring and protection.

#### 10. Facilities and Uses of Broroduct Material

#### License No. 20-1465-1

Rochrig said that only the 400 milliourie Krypton 85 seeled source was being used and that it actually consisted of two units of 160 millicuries each. He reported that they were permanently mounted in a brass container and that the only handling of the unshielded source was when the end caps were assembled. He added that it was only necessary to perform this operation once and that thick rubber gloves were worn. Rochrig stated that he was the only one whe used and handled the Krypton 85 sealed sources and that they had been used in developing and improving instrumentation for gas chappentogra-Dir. 合 叢

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#### ag - 1 License No. 20-1465-3

Vanderschnidt stated that less than 20 ceries of Mitanian and Mirconian triteride fell had been pressured and that three instruments each dontaining apprentimately two suries of tritium foil had been completed. He added that all handling of the foil and its installation in the equipment had been performed in the storage room. Vanderschmidt reported that the three completed instruments were used in other rooms in the building and that on one occasion one of them had been demonstrated in Pittsburgh, Pennsylvania, for the Mine Safety Corporation. He stated that no manufacturing was being performed at the Newton Highlands plant and that the small research group there, working mostly with radium, had conducted similar experiments using approximately one square inch of titanium-zirconium triteride foil. Vanderschmidt said that the actual use and handling of the foil was as follows:

- (1) The foil is checked for strength by placing in an evacuated ionisation chamber. Gloves are worn or tweezers used for this operation, which requires possibly 30 seconds to mount and demount.
- (2) The back of the foil is marked for purposes of identification.
- (3) The foil is placed in a bottle and assigned a number.
- (4) When ready for use, the foil is removed from the bottle, out to the size needed to obtain the radiation intensity desired, and installed in the piece of equipment. (Several seconds are required for outting and two minutes for installation.)
- (5) The source is tagged in the instrument, showing kind; (mantity, and date of monsurement.

Vandersehuidt stated that a special set of tools was used for outting the foil. He skied that the tools were labeled and stored in such a manner so as to ensure their not being used for any other purpose. He said that the tools were sleaned following use and were never handled except when gleves were worn.

Vanderschmidt verified the fact that the zirconium and titanium triteride sources were not actually sealed or encapsulated, in that the tritium is chemically bound to a thin layer of sirconium or titanium which is either rolled or evaporated on stainless steel foil. These tritium foils are not covered in any manner.

#### 11. Instrumentation and Calibration Procedures

Vanderschmidt reported that two Juno survey instruments were available, one a Model H-4-602 Espey Manufacturing Company, and the other, a Model SkJ-1 Technical Associates. An operable Tracerlab radiation meter, Model SU-1H, having a range of 15 to 1500 mr/hr was available. In addition, an Atomic

Instrument Company OM survey meter, Model 409, was reportedly available. Vanderschmidt stated they possessed a special ion chamber which permitted them to check within one percent the radiation activity of the tritium foils.

#### 12. Radiological Safety Precautions and Procedures

Vanderschmidt reported that the users had received their radiological instructions orally from the R.S.O. He said that no written instructions were available but that they were not felt necessary in that the users consisted of only himself, Beehrig and Torney. Venderschmidt statet 1 no rediction merrors had been side of their restricted and unrestrict areas for emission spread, but that submaive checks of the trip feils had peep made to determine any loss in activity. He added that these checks were made once a month and that to date no detertable la had been noted. It was his opinion that the air was indirectly b monitored during these source theses since ream air passes over the source and through the instrument when being theshed. Numberschuldt Apperiad that some of the tritium fails were look tested by the manufacturer, acks a mass spectrometer prior to reachyt of them by MRC. Wanderschuldt sold that upon receipt of the tritium foils, they performed a look test of their own by checking them over a long period of time in a vacuum chamber. He added that no change in ionization intensity was noted. He stated that rubber gloves were always worn during the handling of the tritium foils, tweezers, or tools used during outting operations. Roshrig reported that a radiation survey made initially of the krypton sources showed a dose rate of 25 mr/hr at the surface. Rochrig said that look tests had been performed by the manufacturer, and on one occasion the krypton sources had been returned to the manufacturer for a second leak test and found to be satisfactory.

#### 13. Procurement Procedures and Controls

#### License No. 20-1465-1

Rochrig stated that he was responsible for ordering the licensed material and seeing that the license limit was not exceeded. He reported that Krypton 85 sealed sources were procured from U. S. Radium Corporation and delivered directly to him unopened. He added that the 1000 milliourie Kr sealed source (Serial No. 8596) was procured on 7-17-56. He called attention to the fact that it was originally assayed as 1009 milliouries and later re-assayed and found to be 550 millicuries. Rochrig stated that the two 160 millicurie Kr<sup>85</sup> sealed sources, Model LAB-519, with Source Nos. 9589 and 9590, were procured in December 1956.

#### 1400000 Nos 20-1465-3

Vanderschmidt weid that he was responsible for ordering the tritium feil and fer speing that the license limit was not exceeded. He reported and his records confirmed that approximately 20 curies of tritium feil had been promined to date from the U.S. Badium Corporation. He added that the Receiving Department had been directed not to open the packaged likensed material but to deliver it directly to himself or Mr. Simons. Vanderschmidt stated that the licensed material was produced by requisition, one copy being sent to the AEC and the other to either the Radium Research Corporation or U.S. Radium Corporation. At the time of the inspection, an inventory of their tritium revealed 18.7 curies in one square inch amount or less. Vandorschmidt reported that NRC Equipment Corporation at Newton Highlands had 1.25 curies.

#### 14. Storage and Security of Material

Tritium foil and the two 160 milliourie Kr 55 sealed sources are stored in a locked sabinst in the back physics laboratory. Vanderschmidt reported that the cabinet is looked at all times except when the licensed material is being used and that the room is always looked at might. The room cannot be entered except by entry through the adjacent laboratory which is attended by laboratory personnel. Vanderschmidt pointed out that the access door was posted with the radiation caution sign and symbel and that the personnel had been instructed as to its meaning and intent. Vanderschmidt stated that only he and Winston possessed the key to the cabinet. Three instruments, each containing 2 curies of titanium-sirconium triteride foil, were also stored in the room. Vanderschmidt reported that the 1-1/4 suries of tritium foil used at Herton Highlands and hest in a locked hin not tibunded. 9) > 47 ¢

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#### 15. <u>Maste Disposal</u>

#### Manpag No. 20-146 5-1

The 1000 milliourie Ir 55 sealed source was sold to Ease Recourd & High ing Gengany at Landon, New Jersey, on August 1956, in a working place if equipment for detecting ballum in-air. He added that Esse had assured them that they possessed the necessary specific license to receive the Krypton source.

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#### License No. 20-1465-3

Vanderschmidt reported that no completed instruments containing tritium foil had been sold or transferred as yet. He added that approximately 2 curies of tritium foil as scrap had been returned to the supplier.

#### 16. Posting of Areas - Labeling of Containers

It was noted that, although the area (storage cabinet) where curie amounts of licensed material were being stored and the storage room containing the cabinet were posted with a sign worded "Danger - Radioactivity" and having the prescribed radiation symbol, they lacked the prescribed sign "Caution, Radioactive Material".

Jars "C", "D", "E", and "F", each containing 250 millicuries or greater of zirconium and titanium-triteride foil were not labeled. Another jar containing 7 curies of sirconium-titanium triteride foil was not labeled. Four jars, each containing 100 milliouries or greater of titanium or sirconium triteride foil, although labeled with a sign "Danger - Radioactivity" and having the prescribed radiation symbol and showing the kind, quantity, and date of measurement of the quantity of licensed material each jar sentained, lacked the prescribed sign "Caution - Radioastive Material".

The notal whit housing the two 160 Kr<sup>55</sup> sealed sources, although labeled with a sign "Radiosotive - Avoid Unnecessary Handling" and having the prescribed symbol, was not labeled with the prescribed sign "Caption -Redicaptive Material" and failed to show the kind, quantity, and date of measurement of the quantity it contained. 100

One tritium mounted feil totaling one curie, although tagged with a sign worded "Danger - Radioactivity" and having the prescribed symbol and showing the kind, quantity, and date of measurement of the quantity it contained, lacked the prescribed sign "Caution - Radioactive Material".

The following radiation survey readings were taken by the inspector at the time of the inspection:

2-1/2 mr/hr at the surface of the storage room cabinet

0.4 mr/hr at 3' from the storage cabinet

0.15 mr/hr at the access doorway

less than 4.0 mr/hr at 12" from the 320 millicurie Kr<sup>85</sup> sealed sources.

# 17. Personnel Mord terlas

Vanderschmidt reported that pocket dosimeters are not being worn but that Landauer film badges are worn by the users and processed weakly. A review of the film badge results for NRC at Cambridge and NRC at Herton Highlands Showed the maximum rediction dose reseived in one weak as being 110 milli-rem, with the average being only 15 - 20 millirem. No wrine tritium assay program is in effect or is contemplated unless an unexplained loss occurs.

## 18. Records

Boords of programmi, transfer, and personnel somitaring are by maintained. It was maded that programmed involves, and being of the Personnel Description, with Vancaraman Marine, and being of her the second second and washingtoned. ÷.

With regard to ANC contracts. Tandersemant report ing vacuum (video saniyats of fuel classes and of materials they inc contracts. To added that ind of material few balapped, received, and shared also by clathor regulations and that BD is an account symbol TAC'. 40