

Mr. Mike LaFronzo  
U.S. Nuclear Regulatory Commission  
Region III  
801 Warrenville Rd.  
Lisle, IL 60532-4351

August 2, 2002

Subject: Docket No. 40-6563; License Number STB-401  
Corrective Actions Implementation Pertaining to NRC Inspection Conducted  
July 16-17, 2002

Dear Mr. LaFronzo:

During the subject NRC inspection conducted by you and other NRC staff, several items were identified that could result in improvements to our decommissioning programs. This is our third report to you regarding the progress that we have made toward incorporation of NRC staff identified and self-identified items. The process we have used includes studying and evaluating the items that were brought to our attention, performing root cause evaluations, and implementation of corrective actions. Our goal is to ensure that our decommissioning program is one that is exemplary, meets all decommissioning plan and regulatory requirements, and is one that is protective of the health and safety of workers and the public.

We are pleased to report that all of the recommendations made by NRC staff have been processed and are either completed or in various phases of implementation such as procedural revision approvals and continued training. In addition to the tasks reported to you on July 25, 2000 and August 2, 2002, we have completed the following tasks delineated by heading:

**Training**

- We have continued the process of re-training our health physics technician workforce. The re-training process includes required reading, classroom instruction, and written testing.
- The combination of required reading and classroom instruction continues to result in suggestions for improvements to the radiation safety procedures. These suggestions are being evaluated and implemented when revisions to the procedures are incorporated into the radiation safety program.

### Procedures and Plans

- We have reviewed and improved several of the survey documentation forms used in our radiation safety program to ensure that documentation appropriately addresses all procedural requirements.
- Procedure CT-QA-4.1 was reviewed for modifications to remove ambiguous requirements pertaining to final status survey requirements.
- NRC comments related to the Final Status Survey Design Guide and Final Status Survey Plan for Survey Unit 2501-1 have been incorporated and both documents have been issued for internal review and comment.
- CT-RP-66, "Operation of Scalers, Ratemeters, and Contamination Detectors", has been revised to separate out the requirements related to operational versus final status surveys. The procedure has been distributed for internal comment.
- Procedure CT-RP-67, "Conditional Release of Transportation Containers, Materials, Equipment, and Vehicles" has been commented on and is ready for approval.
- Controlled hard copies of the Decommissioning Plan have been issued to 10 of the 13 controlled copy holders.
- All internal comments have been received and incorporated on our procedures related to compliance with NRC and DOT transportation requirements. These two procedures (CT-RP-23, "Packaging, Marking, and Labeling of Radioactive Material," and CT-RP-24, "Classification and Shipment of Radioactive Material") are ready for approval.
- Procedure CT-RP-22, "Safety Work Permits" is under revision to incorporate NRC comments and improve the permit form.

### Audits

- A report has been issued regarding the audit which was performed to determine readiness of the quality assurance program for the C-T project.
- The radiation safety readiness audit report has been re-issued to incorporate all procedural requirements.

### Laboratory

- Procedures are under development for the calibration and operation of the laboratory counting systems.

Please contact me if you have any questions.

Sincerely,

  
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