

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

July 26, 2002

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

Dear Mr. LaFranzo:

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. Mallinckrodt has carefully studied the items that were brought to our attention and has begun the process of defining the problems, performing root cause evaluations, and implementing corrective actions 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. As of this date, we have completed the following tasks delineated by heading:

Training

- The training program for health physics technicians was evaluated, resulting in the rescinding of certain health physics qualifications for some individuals.
- We have begun the process of re-training our health physics technician workforce. The re-training process includes required reading, classroom instruction, and written testing.
- The testing process has been revised to require answer keys for all tests and grading performed by both the instructor and an independent third party.
- The combination of required reading and classroom instruction has resulted in suggestions for improvements to the radiation safety procedures. These suggestions will be evaluated and implemented when revisions to the procedures are incorporated into the radiation safety program.
- Two Special Work Permits were revised and training given to workers to accurately represent all hazards and personnel protective equipment requirements.

Procedures and Plans

- A review of all radiation safety and quality assurance procedures was performed to identify all procedures in need of revision. A plan for procedure and plan revisions has been developed to incorporate suggestions made during the NRC inspection, as well as self-identified items.

- Procedures currently combine the requirements for operational as well as final status surveys. Revisions to procedures and plans will separate these two types of surveys, resulting in less confusion and easier implementation on behalf of the work force.
- A Corrective Action Request (CAR) has been issued by the C-T QA Manager to address the control and distribution of the Mallinckrodt C-T Decommissioning Plan.
- A CAR has been issued by the C-T QA Manager to ensure that procedures are issued subsequent to approval and that all training has been conducted on the procedure prior to issuance.
- Draft procedures pertaining to packaging, marking and labeling of radioactive material and classification and shipment of radioactive materials have been generated and are currently under the review process.

This is the first of several status transmittals regarding the items identified during your inspection. We are continually evaluating our programs for effectiveness and appreciate your thoughtful review of our compliance. Please call me at (314) 654-1344 if you have any questions.

Sincerely,



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