3M Health Physics Services

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June 20, 2001

Mr. Darrel Wiedeman
U. S. Nuclear Regulatory Commission, Region III
801 Warrenville Road
Lisle, IL 60532-4351

Subject: Written Report Following Notification of Loss of Licensed Material Pursuant to 10 CFR Part 20.2201

Dear Mr. Wiedeman:

On May 3, 2001, 3M notified the U. S. NRC Operations Center of the discovery of the loss of a generally licensed nuclear static eliminator containing 10 mCi of Po-210 at a facility prior to 3M's purchase of that facility. The missing device is an NRD Model 2021 in-line static eliminator. The source is a laminated gold, silver, and polonium oxide foil in a silver matrix approximately 0.007 inches thick. The foil is sealed by electroplating it with gold.

This device was initially leased to W. L. Gore Company's Eau Claire, Wisconsin, facility in August 2000. The device was received by W. L. Gore and installed on a piece of equipment on approximately August 10, 2000. The equipment on which the nuclear static eliminator was installed was shipped to the equipment manufacturer, Everett Charles, for an upgrade on September 6, 2000. When the equipment was returned to W. L. Gore on October 22, 2000, the nuclear static eliminator was missing. 3M announced intent to purchase the W. L. Gore facility on September 12, 2000, and completed the acquisition in November 2000.

On March 14, 2001, 3M Corporate Health Physics visited the former W. L. Gore facility and began to research the history of generally licensed device use at that facility. It was through this review that the missing nuclear static eliminator was identified. The review indicated that all other generally licensed nuclear static eliminators shipped to the facility in 2000 and 2001 were accounted for. Everett Charles was contacted during the week of April 9 and requested to conduct a search for the missing device. The subsequent search at Everett Charles did not locate the device. The device was most likely disposed of in an industrial waste stream ultimately ending up in a landfill.

The safety analysis for the Model 2021 nuclear static eliminator states "The low activity in these devices does not create any toxic problem."

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In order to assure that this does not occur again, 3M has taken several steps. An individual from the Eau Claire facility successfully completed 3M's Radiation Safety Officer training course held on April 2-3, 2001. This course included discussion of the applicable NRC regulations related to generally licensed devices used by 3M as well as the regulations applicable to use of devices held under 3M's specific license, 22-00057-03. In addition, training focussed on compliance with 3M's corporate radiation safety program that includes a semi-annual physical inventory program and tracking of licensed material from receipt at the facility until final disposition. All nuclear static eliminators in use at the Eau Claire facility are currently listed in 3M's corporate radiation device/radioactive material database. Through this combination of training and implemented administrative controls, it is unlikely that licensed material will be inadvertently transferred to a third party in the future.

If you have any questions or comments regarding this matter, please contact Mike Lewandowski, the corporate health physicist assigned responsibility for the Eau Claire facility, at 651-737-4452.

Sincerely,

Frederick B. Entwistle
Manager, Corporate Health Physics
Corporate Radiation Safety Officer