

DowElanco
9330 Zionsville Road
Indianapolis, IN 46268-1054

Simmons



July 10, 1995

Ms. Toy L. Simmons
Nuclear Materials Inspection Section 1
U.S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

Dear Ms. Simmons:

**REPLY TO A NOTICE OF VIOLATION: BROAD SCOPE
MATERIALS LICENSE NO. 13-26398-01 DOCKET NO. 030-32714**

This is in response to your letter dated June 16, 1995, regarding the N.R.C. inspection which you conducted at DowElanco on May 17, 1995. In your letter, you cited DowElanco for failure to accurately calibrate instruments used for the quantitation of radiation.

The reason this occurred is because DowElanco has adopted a practice of annually certifying its Geiger-Mueller counters used in laboratories to detect the presence of radioactive contamination. These Geiger-Mueller counters are annually certified by comparing their response to a Cs-137 check-source. This practice was also used for the Geiger-Mueller counters used to quantitate (1) radiation at the surface of waste containers (after decaying ten half-lives) and (2) removable contamination on the exterior surfaces of incoming packages.

To correct this situation, on May 29, 1995, Ludlum model 3 Geiger-Mueller counter serial no. 96514 was sent to Occupational Health Services, Inc. for calibration. This unit was calibrated on June 8, 1995; it has been returned to DowElanco and placed in service on June 16, 1995 in the Receiving Department where it is being used to quantitate (1) radiation at the surface of waste containers (after decaying ten half-lives) and (2) removable contamination on the exterior surfaces of incoming packages.

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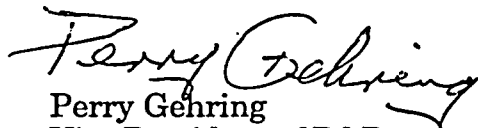
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To avoid recurrence of this situation, Geiger-Mueller counters used to quantitate (1) radiation at the surface of waste containers (after decaying ten half-lives) or (2) removable contamination on the exterior surfaces of incoming packages will be annually recalibrated by Occupational Health Services, Inc. or by some other qualified calibration service.

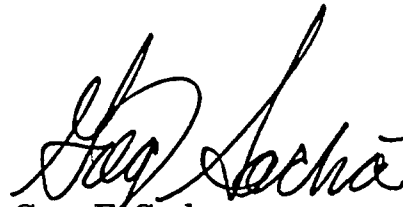
If any Geiger-Mueller counter other than Ludlum model 3 Geiger-Mueller counter serial no. 96514 is used to quantitate radiation levels, it will be calibrated by Occupational Health Services, Inc. or by some other qualified calibration service before it is used for that purpose.

Compliance with the above practice was achieved on June 16, 1995.

Sincerely,



Perry Gehring
Vice President of R&D
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Radiation Safety Officer
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