

4/27/92 57

DRAFT

NEUTRON PRODUCTS, INC.

Supplemental Issues

•HEALTH PHYSICS ISSUES

•Increasing total radiation doses (total man-REM)

Reported in the 1991 review, do the latest monitoring results indicate a continuing trend? What actions have been taken? ~~Has the state followed up on this issue?~~

→ •Improvements to personnel training program

last 2 years

•Initiate a management audit program ^{independent}

These are requirements imposed by the state in 1991. The status of each needs to be addressed.

Have been done

•WASTE ACCUMULATION ISSUES

•Unauthorized off-site storage of DU

Identified in 1991, consists of old teletherapy heads. See letter from R Fletcher to V Miller dated 3/04/92, and memo from J Glenn to V Miller dated 4/08/92.

•OTHER ISSUES

•Numerous and repetative nature of the violations cited during inspections

•Civil Penalty not paid or paid after delay

•Other indications of management antagonism toward state authority

0/4/9

4/13/92

Note to Richard Blanton

Subject: Neutron Products, Inc.

One problem with developing a list of concerns is that we do not have a handle on the current status of the facility. I suggest that prior to spending a lot of time on this activity, we have the State make a presentation about NPI.

I have the following areas that should be added to your list.

PRODUCT IRRADIATORS

- Are these pools also contaminated with cobalt-60?
- Are handling tools used in these pools also used in the main pool?
- Can NPI insure that product leaves the facility is free from contamination?

SERVICE LICENSED ACTIVITIES

- How does Chapter 11 affect NPI ability to recondition units or provide service in the field?
- Given that, recently, two NPI sources removed from equipment in the field have been found to exceed the 0.05 microcurie contamination limit. Is this an indication of infield failure to follow leak test procedures or the inability of NPI to detect that level in the hot cell operations.

16 DOES THE STATE HAVE A LICENSE OR LICENSES IN PLACE THAT CAN CLEARLY BE INSPECTED AGAINST?

Yes IS OFFSITE CONTAMINATION CONTINUING AS NPI? IF YES, AT WHAT RATE WHAT IS BEING DONE TO STOP IT?

IF AN INDEPENDENT ASSESSMENT IS MADE, I SUGGEST THAT YOU BRING IN LOPEZ FROM TEXAS AND LYNCH FROM REGION III TO AUGMENT THE REGION I ASSESSMENT TEAM.

17 HAS THE STATE ASKED FOR HELP YET?

S. B. J. H.

504-2572