



UNION CARBIDE CORPORATION
MEDICAL PRODUCTS DIVISION
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December 8, 1981

U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Attn: Mr. R. R. Keimig, Chief
Projects Branch No. 2
Division of Resident & Project Inspection

Subj: INSPECTION 70-687/81-07

Gentlemen:

This letter is in answer to your Notice of Violation which accompanied the subject inspection report of 11/24/81. Our comments and report of corrective actions are presented in the same order as they appear in the subject notice as follows:

- A. The location of the gamma spectrum analyzer was moved from a former location outside of the reactor building lower counting laboratory to a new location approximately 40 feet away on the same building level. The new area had not been posted because the people in the laboratory considered the new location of the analyzer to be an extension of the old laboratory and therefore considered the former posting to be adequate. The non-compliance item of failing to enter in the area log the quantity of U-235 contained in target tubes to be assayed existed because the target assays had not yet been completed.

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It was the usual practice to make the log entries as assays of targets were completed. This lapse of target weight entry was not considered to be a problem because this area is used solely for assaying finished targets and small samples of liquid plating, feed and waste solutions. The transfer papers with each batch of targets includes a written estimate of the total U-235 content so that the laboratory operator was able to determine that no license limits would have been exceeded before accepting the targets for final assay. All targets are usually assayed the same day they are received. The typical batch of 16 targets would not contain more than 250 gm U-235 and the amount of material in this area never approached the 650 gm limit. These non-compliance items resulted from a differing interpretation of license conditions on the part of the inspector and our staff.

As stated in the subject inspection report, these items were corrected prior to the end of the inspection.

- B. The audit of operations with SNM for criticality safety was performed on November 3, 1981, prior to the completion of the inspection. This audit had been scheduled in the months prior to this inspection.

Very truly yours,


J. J. McGovern
Business Manager
Radiochemicals