



American Radiolabeled
Chemicals, Inc.

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9 April 2010

Director, Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Reference: Docket No 030-20567
License No: 24-21362-01

Subject: Additional Information in Reply to Notice of Violation (dated 4 Feb 2010)

Gentlemen,

Enclosed you will find American Radiolabeled Chemicals reply to your request for Additional Information in reference to the Notice of Violation dated 4 Feb 2010

Thank you for your attention in this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Surendra K. Gupta'.

Surendra K. Gupta, PhD
President
American Radiolabeled Chemicals

RECEIVED APR 16 2010

Response to Request for Additional Information dated 16 March 2010

License 24-21362-01

Docket 030-20567

In response to your first question, all of the signs for restricted areas have been replaced with signs that state "Restricted Area, Authorized Personnel or Escorted Visitors Only". The cause of using the incorrect wording was a failure to see the difference between an escorted guest and an escorted visitor, we thought they were synonymous.

Corrective actions were completed on March 8, 2010. ARC feels that we are now in full compliance with the license requirement.

In response of the second question raised in your letter dated March 16, 2010, the frequency of training will be increased with training sessions on various safety related topics to be held monthly. The topics will include, but not be limited to, conducting hand surveys, the importance of gloves in the lab, and other safety related topics. The first of the monthly training sessions will be held in the first week of May.

ARC considers that we will be in compliance during that first week of May.

It is ARC's intention to move to a radiation work permit type of control of workers entering our restricted areas. This will require daily signatures signifying an understanding of all required safety related concerns. As this will require major procedural revision, ARC will delay implementation until such time as Region III has completed review of the existing procedures.

In response to the third question regarding a safety conscious work environment or SCWE ARC proposes the following...

- A company policy will be implemented to ensure that retaliation will not take place when a safety concern is brought to the attention of management. (Attachment A)
- Individuals raising safety concerns that are brought to the attention of management will also remain anonymous. (Attachment A)
- We will also implement an SOP (Attachment B) driven, anonymous, suggestion box outside each of the labs that will use a form where safety concerns can be noted. The forms will include space for corrective actions and whether the actions required are short term or long term. (Attachment C).
- The forms noted above will be posted so that all employees may note the concern and the corrective actions.
- The monthly training previously noted above will also contribute to maintaining a SCWE.



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Safety Conscious Work Environment Policy

It is affirmed that ARC Management, Officers and Members of the Radiation Safety Committee are committed to achieving and maintaining an environment where individuals feel free, and are encouraged, to bring up safety concerns without fear of retaliation.

It is ARC policy to:

- never retaliate for the raising of a safety concern
- maintain the anonymity of the individual raising the safety concern.

This policy is in place to ensure that ARC provides a safe working environment as well as encourage employees to maintain that attitude, as it is to both our advantage that we achieve and maintain a Safety Conscious Work Environment.

We will train our employees on the importance of various safety related topics to ensure that they understand that safety is our top priority.

Achieving and maintaining a safety conscious work environment is essential and requires ARC to have a safety first focus. This safety first focus by management will foster employee confidence in raising concerns.

A handwritten signature in blue ink, reading 'Surendra K Gupta'.

Surendra K Gupta, PhD
President
American Radiolabeled Chemicals, Inc

**AMERICAN RADIOLABELED CHEMICALS, INC.
STANDARD OPERATING PROCEDURE - SOP-36**

Supersedes: New
Approved by RSC: 4/13/10

Page 1 of 1

SUBJECT: Maintaining a Safety Conscious Work Environment

OBJECTIVE: This procedure provides a means to assure safety concerns raised by individuals at ARC are reviewed, dispositioned and corrected in a timely manner.
And to ensure that there is no retaliation for raising the concern

RESPONSIBILITY: Radiation Safety Committee (RSC).

PROGRAM

1.0 Raising concerns directly

- 1.1 A safety concern may be raised directly with any Company Officer, Member of the RSC, Authorized User, or any member of the Radiation Safety Organization.(RSO)
- 1.2 The individual raising the concern shall remain anonymous at all times.
- 1.3 It is against ARC policy and contrary to Federal Regulations to permit any form of retaliation for raising safety concerns.

2.0 Use of Suggestion Boxes

2.1 Location

Suggestion Boxes are located in the lunch room areas of each of the ARC buildings

2.2 Forms

A supply of "Report of Condition Adverse to Safety" (ROCATS) forms are maintained with the suggestion boxes

2.3 Use

The individual shall list his/her concern in the first box of the form. And place the form in the suggestion box.

- 2.4 The RSO shall, periodically open the suggestion boxes and deliver any ROCATS to the RSC

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Page 1 of 1

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3.0 Disposition

- 3.1 The RSC discusses the merits of the ROCATS and if justified assigns the corrective action to an individual by name and a due date for completion.
- 3.2 The assigned individual makes such corrective actions (both short term and long term), as are necessary.
- 3.3 The completed ROCATS are returned to the RSC
- 3.4 A copy of the completed ROCATS is posted for a minimum of 30 days in order that all may see that actions were taken.

4.0 Records

Completed ROCATS are kept in the RSC minutes file for a minimum of four years.

Report of Condition Adverse to Safety

Safety Concern

Review by Radiation Safety Committee

Recommendations of Radiation Safety Committee

Short Term Corrective Action

Long Term Corrective Action



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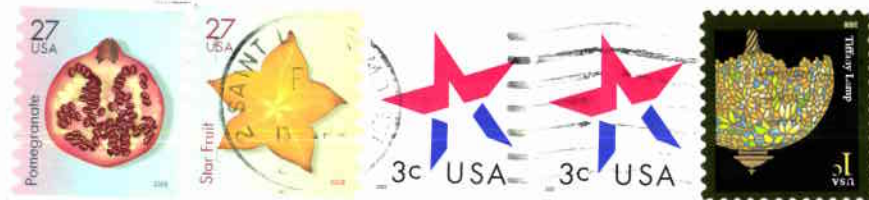
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