

CONVERSATION RECORD  
(time) (date)

TIME | DATE  
9/14 and 9/15, 2010

VISIT  CONFERENCE  TELEPHONE X

INCOMING  
 OUTGOING

NAME OF PERSON(S) CONTACTED OR IN CONTACT: Regis Greenwood, RSO  
ORGANIZATION (OFFICE, DEPT. ETC.): ARC  
TELEPHONE NO.: 314-991-4545

SUBJECT  
C/N 318694

SUMMARY

I contacted Regis Greenwood after I completed reviewing the licensee's e-mail reply to the deficiencies described in the conversation record dated 8/26, 2010. These were items that required further clarification of the licensee's 7/30 reply to my 5/27 deficiency letter. Regis indicated that many of the questions that I had were addressed in the revised SOP's that were sent via mail to the Region III office that we had not received yet. Nevertheless, below is a summary of areas that need clarification or follow-up, including an indication of any changes that have already been made and appear in the revised SOP's (yet to be received), or changes that are proposed and will be made to the SOP's

**Standard Operating Procedures**

SOP-1

e.- Diagram of the ventilation system can be found in the revised SOP-1.

SOP-2:

- a.- counting protocol can be found in the revised SOP-2.
- b.- records discussed in items 4.4 and 4.5 can be found in the revised SOP-2.
- f - Regis will revise items 5.1.2 and 5.2.2 and send a revised page of this SOP.

SOP-3:

- a.- SOP-3 will be revised to state that air sampling systems will be checked daily and the results will be documented
- c.- Regis will submit a copy of the spreadsheet.

SOP-5:

b.- an expanded in-house calibration procedure can be found in the revised SOP-5.

SOP-7:

- 1 f. - checklist in items 4.1, 4.2 and 4.4 can be found in the revised SOP-7. This will be revised to state that maintenance personnel will only discharge washing machine water.
- g. - a clarification will be made that the discharge of waste water will be performed by radiation safety personnel or by authorized users under supervision of the radiation safety staff.
- 1 l. - spreadsheet is attached to revised SOP-7.

SOP-9:

a.- data sheet is attached to the revised SOP-9.

SOP-12: licensee will develop and submit an I-125 bioassay procedure.

SOP-13: licensee will develop and submit an I-125 air monitoring program.

SOP-14: licensee will develop and submit an air monitoring program for P-32 and P-33.

SOP-15: changes appear in the revised SOP-15

*6.3 "daily checks" of what?*

SOP-16:

- b.- a modification will be made that describes who (maintenance staff) will perform decontamination activities when contamination levels exceed the investigation level. [Also, SOP-38 will be revised to include maintenance staff as part of the training.]
- c.- "as needed" will be deleted.
- g.- a change will be made that references the "action levels" as described in section 2.0.
- i. - diagrams were included in the revised SOP.

SOP-17: changes were made in the revised SOP.

SOP-18:

- a.- air effluent data will be submitted under separate cover.
- b.- drawings were included in the revised SOP. These will be in the section/SOP that discusses operation of the compactor.
- e.- maintenance staff perform liquid evaporation. [A revision to SOP-38 will address training which will indicate that maintenance staff must receive SOP-38 training.]

SOP-24: this will be revised to require annual refresher training.

SOP-28:

- b. - a procedure for the calibration of rotameters will be submitted .
- c. - this will be amended to state that the goal is to complete daily checks of air sampling line continuity. Regis will also describe their method of accomplishing this.

SOP-29:

- c.- the licensee will develop an annual audit program for surface contaminated objects. The audit will be submitted for NRC review and incorporated into the license.
- e.- changes were made in the revised SOP.

SOP-30:

- a.- a copy of the datasheet was attached to the revised SOP.

SOP-32:

- a.- the licensee will readdress this item and will discuss additional methods that will be used to help mitigate disposal of hot trash in cold waste receptacles, e.g., training, postings near receptacles, etc.

**Emergency Procedures:** licensee will develop and submit a new SOP that addresses emergency procedures.

**Radiation Protection Program (RPP):**

Item 4.a. – the RSO will re-review this item and submit a response.

Item 6.a. and b. – this is addressed in the revised RPP.

**Additional items documented in conversation record dated 8/26/2010:**

- Revise survey procedures to include a more robust survey requirement for individuals who exit laboratories. Recent inspection activity identified laboratory staff who had contamination on their shoulders, upper back, and top of head.
- Modify SOP-16, items 3.1 and 3.2 to specify a timeframe for investigating, determining the source and cause, and documenting the results of a contamination event where an investigation level is exceeded.

ACTION REQUIRED

FAX response **no later 9 /22/10** to 630-515-1078 and e-mail to [kevin.null@nrc.gov](mailto:kevin.null@nrc.gov). In your response, please provide a date as to when you will submit SOP's 12, 13, and 14; the audit program described in SOP-29; air effluent data related to SOP-18; and an SOP for emergency procedures.

NAME OF PERSON DOCUMENTING CONVERSATION

Kevin Null

SIGNATURE

*Kevin Null*

DATE

9/15/10

ACTION TAKEN