

Gattone, Robert

From: Regis Greenwood, CHP [regisgreenwood@arc-inc.com]
Sent: Friday, April 01, 2011 9:16 AM
To: Gattone, Robert
Subject: RE: Questions
Attachments: transmit 20.1101(d) results to Doc Control.doc; transmit 1101 repoprtr to RIII.doc

Bob, Attached is the letter sent to Document Control. Also attached is the cover letter to Region III transmitting a copy of the letter sent to Document Control.

Hope this helps.

RG

Regis A Greenwood, CHP, FHPS
Director, Regulatory Affairs
Radiation Safety Officer
regisgreenwood@arc-inc.com
314-991-4545

From: Gattone, Robert [<mailto:Robert.Gattone@nrc.gov>]
Sent: Thursday, March 31, 2011 12:41 PM
To: Regis Greenwood, CHP
Subject: RE: Questions

Regis,

I still haven't received the document referenced below. Can you please email it to me?

Bob

From: Regis Greenwood, CHP [<mailto:regisgreenwood@arc-inc.com>]
Sent: Friday, March 25, 2011 8:43 AM
To: Gattone, Robert
Subject: RE: Questions

Bob,

It was sent on 17 February to Document Control . Copy of Heading below

17 February 2011

U.S.Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

Subject: Report of Exceeding Constraint in 10CFR20.1101(d)

Was sent by regular mail.

RG

Regis A Greenwood, CHP, FHPS
Director, Regulatory Affairs
Radiation Safety Officer
regisgreenwood@arc-inc.com
314-991-4545

From: Gattone, Robert [<mailto:Robert.Gattone@nrc.gov>]

Sent: Thursday, March 24, 2011 12:53 PM

To: Regis Greenwood, CHP

Subject: Questions

Regis,

Did you send the report about going over the constraint (10 CFR 20.1101(d))?

If so, when?

What address did you send it too?

Bob

17 February 2011

Administrator, Region III
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: Report of Exceeding Constraint in 10CFR20.1101(d)

Dear Sir,

Enclosed you will find a copy of American Radiolabeled Chemicals report sent to the Document Control Desk in Washington DC

This copy is being sent in accordance with 10 CFR20.2203

Thank you for your attention in this matter.

Sincerely,

Surendra K. Gupta, PhD
President
American Radiolabeled Chemicals

17 February 2011

U.S.Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

Subject: Report of Exceeding Constraint in 10CFR20.1101(d)

Gentlemen,

This report is submitted in accordance with 10CFR20.2203(b)

American Radiolabeled Chemical, Inc (ARC) has been measuring the airborne concentrations at the intakes to our Building 400, the closest building where members of the public are found. There are four individual intakes for the four zones of the building. As these zones are not mixed, the zones are treated separately.

Due to many one time circumstances, the final calculations for the proceeding year were not completed until February 16th of 2011.

During the calendar year 2010 the dose in a year to the exposed members of the public were determined to be:

55.9 mrem in a year for Zone 1
37.8 mrem in a year for Zone 2
10.0 mrem in a year for Zone 3
7.9 mrem in a year for Zone 4

The dose limits for the general public found in 10CFR20.1301(a)(1) were not exceeded.

The cause of the increase was increased production of labeled chemicals for medical research. This resulted in a large increase in the use of, and consequently the release of, Tritium.

Corrective steps taken:

Reduction in the amount of Tritium used in each reaction;
Increased use of cold traps for Tritiated water
Increased use of charcoal traps for Tritium gas.

Corrective steps planned:

1. Submission of a license amendment request to place charcoal filters on the exhaust of the Tritium process hoods.
2. Calculation of the public dose monthly *vice* annually.
3. Submission of an amendment request to permit the use of the COMPLY code on a monthly basis for screening purposes.

Actions to prevent recurrence:

ARC feels that the steps taken and planned will prevent the total annual dose from exceeding 10 mrem in a year.

Determination of the dose on a monthly basis will enable us to make any additional changes required prior to the year ending.

Unofficial use of COMPLY with January's data shows a projected annual dose within the constraint.

Thank you for your attention in this matter.

Sincerely,

Surendra K. Gupta, PhD
President
American Radiolabeled Chemicals