10-01425-16
03010638

USNRC Region I DNMS

December 11, 2012

2100 Renaissance Blvd

King of Prussia, PA 19406

2012001
J6

Subject: Reply to a Notice of Violation

Reference: NRC Inspection Report No. 03010638/2012001, Docket No. 03010638, dated 12/04/2012, License No. 10-01425-16.

Dear Sir/Madame,

This letter is in response to the attached Notice of Violation (copy enclosed). Each violation is referenced for convenience, followed by the response of Lockheed Martin Aeronautical Company - Marietta (LM Aero - Marietta).

USNRC NOV Item A:

The LM Aero-Marietta Radiation Safety Officer (RSO) discovered the Plutonium-Beryllium (Pu-Be) inventory discrepancy while performing a comprehensive evaluation of radioactive materials in preparation for renewal of the site's USNRC operating license (No.10-01425-16). In an effort to resolve the error, the RSO included the Pu-Be source as a separate entry on the license renewal application submitted to the USNRC in September, 2012. After consulting with the USNRC, the RSO initiated an investigation to obtain additional information if possible on the origin of the Pu-Be source.

As a result of the investigation, information gathered indicated that during the 1950s and 1960s Lockheed Martin was engaged in a research engineering project to evaluate the feasibility of manufacturing a nuclear powered aircraft. The research effort was conducted at a site location in Dawsonville, Georgia. Per information obtained from Materials & Processes Engineering, the research facility began initial closure in 1961 and completed a final lock down in 1963. It is believed that the facility remained deactivated for some time. During this closure period, the Pu-Be source was transferred to Marietta and has remained in secure storage since that time.

Historical documentation regarding this specific source is minimal at best. It is our intent to retain this source in our secured storage area on site (T-599L Building), unused, and pursue acceptable avenues of transfer or disposal.

USNRC NOV Item B:

The leak test for the Plutonium-239 foils was not completed by the RSO as the material quantity listed in historical records is expressed in milligrams. During a recent site audit held on November 6th, 2012, the USNRC inspector and the RSO completed a series of calculations which indicated that the specific quantity of material listed slightly exceeded the activity threshold required for leak testing. A leak test was subsequently completed, as witnessed by the inspector, and results received have indicated less than 185 Bq (<0.005 uCi). The Pu-239 foils have been added to the leak test inventory to ensure future compliance with this requirement. The intent of the RSO is to actively pursue approved avenues of disposal or transfer for this material.

If there should be additional questions regarding this matter, please contact me directly at 678-314-7887.

Respectfully,

Neale A. Parkinson

Neale A. Parkinson

Radiation Safety Officer

Approved:

Lisa L. Bosserman

Lisa L. Bosserman

Environmental, Safety & Health Engineering Manager

Nap/cc: L Bosserman