

April 21, 1980

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Mr. George H. Smith, Chief
Fuel Facility & Materials Safety Branch
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Re: Docket No. 70-124
Inspection 70-124/80-01
NRC License No. SNM-107

Dear Mr. Smith:

As 10CFR2.201 requires, please be informed:

- 1) Item A (infraction) - 10CFR21.21 (a) and 10CFR21.6 - We have posted the requirements of 10CFR21.6 and have written and adopted appropriate procedures to comply with 10CFR21.21 (a). The procedures may be found in our Radiation Safety Code and Quality Control Manual.
- 2) Item B (deficiency) - Condition 8 License SNM-107 - Mr. L. F. Casabona, Manager, Mass Spectrometry Services, has been issued the appropriate Radioactive Waste Disposal Record cards, onto which his personnel will enter the isotopes, estimated quantity, and date whenever disposing of waste. These records are to be attached to the containers. As we are in the middle of an inventory, this item will be in compliance no later than May 1, 1980.
- 3) Item C (deficiency) - 10CFR20.203 (f) - All of the waste containers to be used in the Sample Preparation Laboratory and the access doors will be posted with the appropriate radiation caution symbol and the words "Caution-Radioactive Material". In addition, to ensure compliance the rooms will be posted "Authorized Personnel Only" and during off hours the rooms will be locked. This should relieve us from labeling every sample container pursuant to 10CFR20.203 (f) (3) (iv) and (vi).
- 4) Item D (deficiency) - 10CFR70.54 - Mr. L. F. Casabona, Manager, Mass Spectrometry Services, has been informed that the container type to be used is DOT 17-H. The other item was apparently a typographical error, and Mr. Casabona has informed me that he will proofread the forms more carefully in the future. A control procedure will be instituted whereby the forms will be double checked on a sampling basis by either S. Black, R.S.O., or another qualified person. Verification of the check will be stamped on each form, thus checked, and initialed and dated by the reviewer. As we need a rubber stamp made for this, full compliance is expected no later than May 1, 1980.
- 5) Infraction 124/77-0403 - criticality - We are currently requesting an amendment for exemption to the requirement for a criticality alarm pursuant to 10CFR70.24 (b). We feel that due to the nature of the material and the location, we will not be required to install the device.

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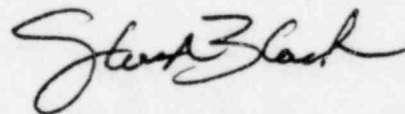
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- 6) IE Bulletin 79-19 - We have completed the requirements of the referenced bulletin and are in the process of incorporating the procedures in a completely revised and reorganized Radiation Safety and Quality Control Manual.

If you so request, we will send you a copy of the Radiation Safety and Quality Control Manual as soon as it is completed.

If you have any questions, please do not hesitate to call.

Sincerely,



Steven A. Black, Manager
Radiological Services Department

SAB:jk

Enclosure: Application for
exemption