



**BAKER**  
**SAND CONTROL**  
A Baker Hughes company

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TELEX NO. 888813 BAK UW

13 October 1989

United States Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596

RE: Reply to a Notice of Violations  
Docket No. 83C-20611  
License No. 50-21402-01

ATTN: Document Control Desk

**VIOLATION A:**

License condition 14, Item 13B, stipulates in part that all radioactive material will be stored inside a locked steel cabinet. At the time of the inspection six cobalt -60 sources were stored in an unlocked steel cabinet at the Prudhoe Bay, Alaska facilities.

EXPLANATION OF VIOLATION:

In addition to cobalt-60 source, other small parts and expendable commodities are kept in this locker. Inadvertently the lock was obviously not replaced when access was gained to these other commodities.

CORRECTIVE ACTION TAKEN:

The lock was replaced on August 30, 1989. The commodities and parts that require access were removed and access restricted to authorized personnel.

**VIOLATION B:**

License condition 14 stipulates in part a program will be conducted in accordance with the statements, representations, and procedure contained in the application, dated June 3, 1983, page three of attachment five, whereas a Radiation Storage Area Survey Form will be completed quarterly. During NRC inspection the survey form for the 3rd quarter of 1988 and the 1st and 2nd quarters for 1989 were missing.

EXPLANATION OF VIOLATION:

A subsequent inspection of the files in Kenai was conducted on September 5, 1989 and the Storage Area Survey Forms in question were located. A copy of these forms is included.

8911030058 891024  
REGS LIC30  
50-21402-01 PDC

RECEIVED  
NRC REGION V  
OCT 23 1989  
10:12

CORRECTIVE ACTION TAKEN:

The misfiled forms in question were placed in their appropriate files. Current filing procedures were reviewed.

**VIOLATION C:**

A "CAUTION, RADIOACTIVE MATERIAL(S)" sign, as required by 10 CFR 20.203 (e), at the time of the NRC inspection was not posted at the Prudhoe Bay, Alaska facility where the cobalt-60 is located.

EXPLANATION OF VIOLATION:

During a reorganization of the Prudhoe Bay facility the "CAUTION, RADIOACTIVE MATERIAL(S)" sign was misplaced or overlooked.

CORRECTIVE ACTION:

A new sign was purchased and posted, as stipulated in 10 CFR 20.203 (e), on August 30, 1989. A review of 10 CFR 20.203 provisions was done with involved employees.

**VIOLATION D:**

License condition 12 provides in part that a biannual inventory of sealed substances would be conducted and records kept for a period of 2 years. At the time of the inspection the records of the inventory for the 2nd half of 1988 were not properly completed.

EXPLANATION OF VIOLATIONS:

On September 5th the files were inspected, the inventory record in question was not located and is presumed to have been misfiled and subsequently lost.


CORRECTIVE ACTION TAKEN:

As stated in Violation B, Corrective Action Taken, our current filing procedures were reviewed and our records are currently now in order.

If I can be of any further assistance please contact me.

Sincerely,

Baker Sand Control a Division of  
Baker Hughes Production Tools, Inc.



Steve L. Tyler  
Alaska Area Manager

BAKER SAND CONTROL  
RADIATION STORAGE AREA SURVEY  
KENNY DISTRICT

DATE: 11-2-68

SURVEY METER IDENTIFICATION:

MANUFACTURER Westcott MODEL # 132 SERIAL # 570011

SURVEY READINGS

1. AT CABINET SURFACE

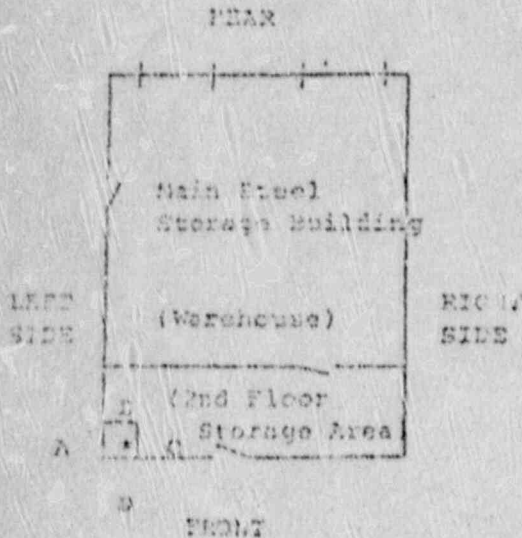
Point A. .07 (MR/HR)  
 Point B. .07 (MR/HR)  
 Point C. .08 (MR/HR)  
 Point D. .06 (MR/HR)

2. 1' FROM CABINET SURFACE

Point A. .05 (MR/HR)  
 Point B. .05 (MR/HR)  
 Point C. .08 (MR/HR)  
 Point D. .07 (MR/HR)

3. 3' FROM CABINET SURFACE

Point A. --- (MR/HR)  
 Point B. --- (MR/HR)  
 Point C. .01 (MR/HR)  
 Point D. .02 (MR/HR)



\* Locked Steel Storage Cabinet  
 for Radioactive Material Storage.

MEASUREMENTS TAKEN BY: W. C. White

Note: This form must be completed quarterly, or whenever a new shipment of radioactive material is received, and then returned to the Radiation Protection Officer.

BAKER

WASTE SAND CONTROL  
RADIATION STORAGE AREA SURVEY  
KWAJALEIC DISTRICT

DATE: 3-14-89

SURVEY METER IDENTIFICATION:

MANUFACTURER VICTORSEN MODEL # 439 SERIAL # 3710914

SURVEY READINGS

1. AT CABINET SURFACE

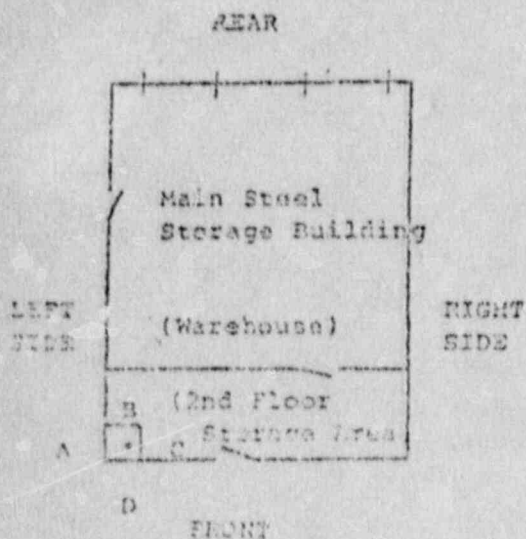
|          |            |         |
|----------|------------|---------|
| Point A. | <u>.06</u> | (MR/HR) |
| Point B. | <u>.05</u> | (MR/HR) |
| Point C. | <u>.03</u> | (MR/HR) |
| Point D. | <u>.06</u> | (MR/HR) |

2. 1' FROM CABINET SURFACE

|          |            |         |
|----------|------------|---------|
| Point A. | <u>.07</u> | (MR/HR) |
| Point B. | <u>.04</u> | (MR/HR) |
| Point C. | <u>.05</u> | (MR/HR) |
| Point D. | <u>.06</u> | (MR/HR) |

3. 3' FROM CABINET SURFACE

|          |            |         |
|----------|------------|---------|
| Point A. | <u>.01</u> | (MR/HR) |
| Point B. | <u>.01</u> | (MR/HR) |
| Point C. | <u>.01</u> | (MR/HR) |
| Point D. | <u>.01</u> | (MR/HR) |



\* Locked Steel Storage Cabinet for Radioactive Material Storage.

MEASUREMENTS TAKEN BY: R. J. [Signature]

Note: This form must be completed quarterly, or whenever a new shipment of radioactive material is received, and then returned to the Radiation Management Division.

HAIRER

BARRER FANS CONTROL  
RADIATION STORAGE AREA SURVEY  
KENAI DISTRICT

DATE: 1-6-59

SURVEY METER IDENTIFICATION:

MANUFACTURER VICTORWREN MODEL # 493 SERIAL # 3709 M

SURVEY READINGS

1. AT CABINET SURFACE

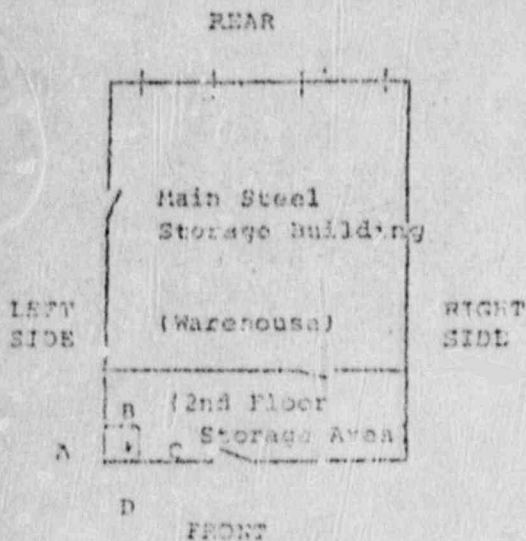
Point A. 06 (MR/HR)  
Point B. 08 (MR/HR)  
Point C. 07 (MR/HR)  
Point D. 02 (MR/HR)

2. 1' FROM CABINET SURFACE

Point A. 05 (MR/HR)  
Point B. 04 (MR/HR)  
Point C. 04 (MR/HR)  
Point D. 05 (MR/HR)

3. 2' FROM CABINET SURFACE

Point A. 5 (MR/HR)  
Point B. 01 (MR/HR)  
Point C. 01 (MR/HR)  
Point D. 01 (MR/HR)



\* Locked Steel Storage Cabinet  
for Radioactive Material Storage.

MEASUREMENTS TAKEN BY: Howe W. J.

Note: This form must be completed quarterly, or whenever a new shipment of radioactive material is received, and then returned to the Radiation Protection Officer.