

September 2, 1980

U. S. Nuclear Regulator Commission 611 Ryan Plaza Drive Suite 1000 Arlington, Texas 76012

Reference: License No. 42-16559-01

Attention: Mr. Glen D. Brown, Chief

Fuel Facility and Materials

Safety Branch

Gentlemen:

This letter of response, is being submitted in reply to your notice dated August 22, 1980 and in response to the requirements of 10 CFR Part 2 Section 2.201.

Item A

- "Pocket dosimeters be recharged at the beginning of each work shift."
 - (1) All radiographic personnel at the Folcroft and Rahway locations have been re-instructed regarding the proper use of pocket dosimeters and the specific requirement to zero dosimeters at the beginning of each work shift.
 - (2) Corrective steps to avoid further noncompliance shall consist of:
 - a. Special attention to this item during internal audits.
 - b. Spot checks of dosimeters by management.
 - (3) We are in compliance at this time.
- "Internal inspections of radiographers at three month intervals."
 - All radiographers at these locations have had the required inspections.
 - (2) A control system will be maintained to properly control and anticipate due dates for inspections.

NOOX

CONAM Inspection Div.

Item A (continued)

- (3) We are in compliance at the present time.
- "Daily Radiation Reports" activities conducted prior to recording necessary information on report.
 - (1) Radiographers at these locations have been re-instructed in the proper method of recording the necessary information on the Daily Radiation Report.
 - (2) Management will check the progress of the daily report during internal audits and spot check this item on a random basis.
 - (3) We are in compliance at the present time.

Item B

- "Pocket dosimeters" checked at periods, not to exceed one year, for proper response to radiation.
- Note: At the time of the audit, the best available information indicated we would be allowed one year from the date of the requirement (3-3-80) to establish procedures for the checking of dosimeters, manufacturer equipment, establish record keeping etc. etc. Luckly we have completed most of our activities and can accelerate our activities and have a workable system in the near future.
 - Procedures have been developed for the checking of dosimeters.
 - Dosimeter labels have been ordered and received. Camera attachments have been manufactured. Inspection forms and inventory logs have been developed.
 - (2) Corrective steps will be the distribution of the above, with instructions to verify the response of all dosimeters as soon as possible.
 - (3) Because of the many locations of our agreement (and non-agreement) offices and their field locations, I would expect to have over 50% of dosimeters inspected by September 30, 1980 and be in full compliance by October 31, 1980.

Sincerely,

Otis Gamble

Radiation Safety Officer

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cc: All Labs