

DEC 29 1989

American Radiolabeled Chemicals
ATTN: Surendra K. Gupta, Ph.D.
11612 Bowling Green Drive
St. Louis, MO 63145

License No. 24-21362-01

Gentlemen:

This refers to the telephone conversation on December 29, 1989, between you and Messrs. C. E. Norelius, R. J. Caniano, and J. A. Grobe of my staff regarding radiation safety concerns identified by our inspectors during a recent inspection of your facility.

Based on that conversation, it is our understanding that effective at close of business today, December 29, 1989, American Radiolabeled Chemicals (ARC) will cease all production related activities associated with NRC licensed materials, will maintain NRC licensed materials in safe storage, and will not restart production activities until you:

1. Evaluate exposures (internal and external) to present and former employees who have handled radioactive materials while employed at your facility from January 1, 1989 to the present.
2. Evaluate radioactive airborne concentrations released from your laboratory to the environment from January 1, 1989 to the present.
3. Demonstrate that ARC has the knowledge and capabilities to evaluate bioassay and air monitoring data to assure that personnel exposures and releases of radioactive materials to unrestricted areas are within applicable regulatory limits in 10 CFR Part 20.
4. Train your employees in accordance with the provisions set forth in 10 CFR 19.12 and the training program authorized in your NRC license.
5. Evaluate work practices and equipment to assure ARC is maintaining radiation exposures and releases of radioactive materials in effluents to unrestricted areas as low as reasonably achievable.
6. Provide a report of actions taken by ARC to satisfy items 1 through 5 above to the NRC Region III office for review and approval by the Regional Administrator.

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We understand that you will distribute any materials which have been prepared and are awaiting distribution or redistribute prepackaged materials you receive provided they have been prepared for shipment in accordance with the agreement reached with you on December 22, 1989 (Confirmatory Action Letter, CAL-RIII-89-026).

Issuance of this Confirmatory Action Letter does not preclude the issuance of an Order requiring implementation of the above commitments. If your understanding differs from that set forth above, please contact this office by telephone at (708) 790-5500.

Sincerely,

Original signed by
A. Bert Davis

A. Bert Davis
Regional Administrator

cc: DCD/DCB (RIDS)

bcc: J. Clifford, EDO
J. Lieberman, UE
J. Goldberg, OGC
R. Bernero, NMSS
J. Glenn, NMSS

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Caniano/jl
12/29/89

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MaFlett

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Morelius

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Grobe
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Berson
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Paperiello

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Davis
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