

PHILLIPS PETROLEUM COMPANY

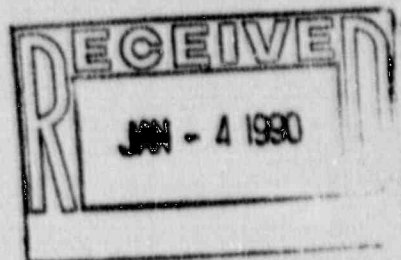
BARTLESVILLE, OKLAHOMA 74004
918 861-7707

C. F. COOK
Vice President
Research and Development

January 2, 1990

Re: Docket: 30-05897/89-01
License No.: 35-00313-03

United States Nuclear Regulatory Commission
Attn: A. Bill Beach
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011



Dear Mr. Beach:

In reply to your letter dated December 6, 1989, of the findings of your inspector during an unannounced radiation safety inspection, the following is our reply pursuant to the provisions of 10 CFR 2.201.

Item 1: License Condition 7.B. authorizes the possession of sealed sources. License Condition 6.B. authorizes the possession of such sources containing any byproduct material with Atomic Numbers 4 through 83.

Contrary to the above, on February 6, 1986, the licensee had received a 30-millicurie plutonium-238 sealed source (Amersham Model PPC, Serial No. B350), a material they were not authorized to possess. The source was transferred from another license held by Phillips Petroleum Company in Bartlesville, Oklahoma. The source was still in the licensee's possession during an inspection conducted on November 2 and 3, 1989.

Response: The Amersham Model PPC, Serial No. B350 metal analyzer has been shipped for disposal through Texas Nuclear. The source should be disposed of and proper paperwork concerning its receipt and disposal will be completed by January 15, 1990.

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Item 2a: Item 6 of the application describes the institutional training program. Specifically, this includes general instruction to personnel biannually including interaction of radiation, ALARA, biological effects of radiation, safety measures, waste management, personnel monitoring, record keeping, NRC regulations, and updates.

Contrary to the above, during the period from October 1987 through October 1989, the licensee had conducted only one training session, on October 28, 1988, and had not met the required biannual interval.

Response: A training program has been conducted on December 7, 1989 by Dr. B. Ahluwalia, Department of Radiological Sciences, University of Oklahoma, on areas as outlined in the license. This training will be done as outlined in our license biannually. In addition, monthly safety meetings are conducted by Supervisors to discuss any safety or health issues that the personnel may have.

Item 2b: Item 20 of the application specifies that the RSO will conduct semiannual audits of each authorized user in the program. These audits are to include posting of required signs and notices; waste disposal containers; use of gloves; storage area; receipt, utilization and disposal records; inventory; and surveys.

Contrary to the above, the inspector determined that the licensee had conducted one such audit in December 1988, but had not performed program audits at the required semiannual intervals during the period from October 1987 through October 1989.

Response: The RSO will insure that the semiannual audits are conducted of each authorized user and has taken steps to actively involve the Radioisotope Committee members in these audits. The audits will be done on a minimum of semiannual. The RSO completed a review of the program on December 18, 1989.

Item 2c: Item 12 of the application specifies that survey instruments will be calibrated annually and following repair. This item further specifies that instruments will be considered properly calibrated when readings are within 10 percent of the known value for each point checked. Instruments reading within 20 percent may be used only if accompanied by a calibration chart attached to the instrument.

Contrary to the above, the inspector determined that the licensee's 13 survey instruments had been calibrated in December 1987 and not again until March or April 1989, a period exceeding the required annual interval. Additionally, two of these instruments were 25-30 percent off the acceptable calibration reading and one instrument was 40-50 percent off the acceptable value. The licensee had used these instruments during this period to perform routine radiation surveys.

Response: Steps have been taken to insure that communications between the RSO and individuals responsible for insuring calibration of instruments are completed on a timely basis. In addition, members of the Radioisotope Safety Committee have to report biannually on safety audits completed within their areas of assigned responsibility. Including in these audits are proper calibration of instruments.

Item 3a: Item 8 of the application specifies that all radioactive waste material will be held for decay or storage in an area identified as Building 88-H.

Contrary to the above, during October 1989 the licensee had moved the radioactive waste storage area from the designated location at Building 88-H to Building 85-E.

Response: Materials were moved from Building 88-H to 85-E to accommodate remodeling in 88-H. All necessary surveys and decontamination activities were accomplished before access by workers was allowed. On December 5, 1989, the Licensee applied for a change in the license noting the change in location of the waste storage area.

Item 3b: Item 14 of the application specifies that radiation surveys will be routinely performed and that records of survey date, location, and surveyors will be maintained. Item 15 of the application specifies that surveys of the waste storage area will be performed monthly.

Contrary to the above, the inspector determined that surveys of the licensee's waste storage area had been conducted at the required monthly interval but that records of such surveys had not been maintained as required.

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Response: Proper files are maintained and instructions have been issued for surveys of the licensee waste storage area at the required monthly interval.

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