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January 3, 1990

Mr. A. Bert Davis
Regional Administrator
Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: MRI (License No. 24-0256-4-02) Understanding of
Confirmatory Action Letter of December 20, 1989

Dear Mr. Davis:

This letter is in reply to your confirmatory letter of December 20, 1989. According to our understanding, MRI has put into safe storage all radioactive materials except carbon-14 being used in ongoing research studies. This includes all gas chromatographs with nickel-63 detectors not in use and not covered under a general manufacturer's license.

There are six chromatographs under our specific license that are being used in a secure facility. To remove these chromatographs from use in the secure facility immediately and move them to another secure storage facility, would require more handling of these instruments over the next few working days than completing ongoing research. We request a delay in the decommissioning of these chromatographs until January 15, 1990, or until our new Radiation Safety Officer is approved. We believe this would minimize handling and moving of these detectors over the short term and also allow a reasonable period to conclude research projects or shift work to other instruments that are under manufacturer's license. If our new Radiation Safety Officer is not approved by January 15, we will decommission all chromatographs with nickel-63 detectors not covered under a general manufacturer's license.

MRI has used these instruments in a safe manner, without incident since 1971. We have an active wipe test program. During this interim period (through January 15) we will wipe these chromatographs daily. It has always been MRI policy and practice to not disassemble nickel-63 detectors for any reason including cleaning. This policy will be reiterated to all chromatography users. To further secure the detectors, evidence tape will be placed in appropriate locations on the chromatographs. The security and wipe status of these chromatographs will be reported daily to me.

I believe our additional precautions and short delay in

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decommissioning will ensure the safety of continued usage and prevent undue hardship on MRI. The sudden interruption of government research programs supported by these instruments would also result in increased shut-down and start-up costs to the government.

MRI has always complied and will continue to comply with all NRC regulations to the best of our ability. We regret that we misinterpreted the requirements to communicate our new Radiation Safety Officer to you because of the procedures outlined in our approved Health Physics Procedures Manual. We look forward to your response to our request and will comply immediately.

Very truly yours,

Deane N. Sunderman
by J. Spigarelli

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