Advanced Radiation Service

MACRATAN DE ROBAL XX VARIOUN AND SORRAT XX RROPE SOURCES

271 Plainfield Road, Edison, NJ 08817

September 24, 1980

U.S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, Perusylvania 19406

Reference: Docket No. 030-08048 - Inspection 80-01 dated July 29, 1980

Gentlemen:

The following action has been taken to correct those infractions/deficiencies noted in Appendix A to the above referenced letter:

Item A - 10 CFR 101(A) Radiation Dose Standards for Individuals in Restricted Areas

An employee of Advanced Radiation Service did receive a whole body radiation dose of 1.270 rems during the second quarter of 1979, as reflected by his film badge reading. However, the 020 rems to the individual was not actually received in the second quarter of 1979 but in the third quarter. This was due to the fact that the Radiation Protection Officer did not issue the film badge to this individual until one (1) week beyond the calendar quarter ending July 14, 1970, thus resulting in the individual receiving an additional 020 rems on the film badge.

This procedure is not a practice of Advanced Radiation Service and will not occur in the future. To avoid any such occurence, Advanced Radiation will issue film badges one day before the due date of the 15th of each month effective immediately.

Item B - Reports of Overexposures and Excessive Levels and Concentrations

The understanding of the Radiation Protection Officer was that a dose greater than 2.000 rems was a reportable incident requiring notification of the NRC Regional Office. 10 CFR 20.101(A) and 10 CFR 20.405(A) have been discussed with all employees of Advanced Radiation Service and are fully understood and shall be used to minimize doses this close to allowable limits for any calendar quarter.

Item C - Storage of Licensed Materials at 1079 E. Grand Street, Elizabeth, NJ

Only a Tech Ops Survey Meter Calibration Kit Model 571 is stored at 1079 East Grand Street, Elizabeth, NJ. This location is in a very high crime area. The building is located in the rear of an industrial complex with no lighting. Our work assignments require individuals to start work during late evening and early morning hours. ARS personnel will not work from this address at these hours for fear of mugging, robbery, etc. Licensed materials have been stored at a location in Iselin, New Jersey, where vehicles are fenced in, well lighted, and protected by local police.

8107090435 801229 NMS 1.IC30 29-14171-01 PDR These vehicles were classified as temporary overnight storage "unrestricted area" where levels of idiation are less than 2 mr/hour from the vehicle. For several years NRC is spectors were shown the location and it was explained in detail the purpose of storing sealed sources on parked vehicles as an "unrestricted area". No contradiction to this method was mentioned.

We are in the process of obtaining a permanent storage facility, which should be on or about September 30, 1980, hopefully sooner. At such time, a description of the storage building and location will be submitted.

Item D - 10 CFR 20.105(B) Radiation Levels in an Unrestricted Area

On June 5, 1980, we had a barrier of 200 squarefeet set up. Mr. Rowe and Mr. Kurtz made the survey around the perimeter of approximately 800 feet of radiation rope barrier. This high level was found three feet from the ground. The source was focused in a northerly direction columated with addiational lead surrounding the source to minimize radiation levels. Only one exposure was required in this direction for a duration of six minutes. There were no refinery or contractor personnel in the area. The Assistant Radiographer was monitoring the northern area will within safe limits. No individual could have entered this area without being observed.

To correct this situation a larger barrier will be erected or faster film will be utilized and a closer source to film distance will also be used. All of these factors should contribute to an exposure of one third the time of six minutes, so that any individual would receive a dose of 2 mr/hour or less.

Item E - 34.33(A) Personnel Monitoring Equipment

ARS personnel have been instructed to charge their dosimeters each morning when performing radiographic inspection work. The charger in question was not working properly on this date. Mr. Kurtz had two dosimeters. He tried one and it went off scale and could not be brought back on scale. Mr. Kurtz would not try to zero the second dosimeter for fear it too would go off scale, resulting in not being able to continue work.

To correct this situation ARS has purchased two new dosimeter chargers and these are on said vehicles. Each vehicle has two operable chargers and dosimeters are charged daily at the beginning of each shift. Effective June 9, 1980.

Item F - 10 CFR 34.33(C) Personnel Monitoring

ARS personnel have been issued many new dosimeters over the past years. If any dosimeter does not seem to respond to recharging or will walk off scale, a new dosimeter is issued. ARS personnel have two dosimeters on hand at all times.

Corrective action to be taken will be to have radiographers and radiographers assistants write down the expiration or calibration due date next to their dosimeter serial number on the reverse side of the Utilization Log. When the Radiation Protection Officer will check for correct response to radiation. Effective immediately.

Item G - 10 CFR 34.25 Leak Testing

A misinterpretation of this statute was a serious error on Mr. Kurtz's part as Radiation Protection Officer.

A leak test of Tech Ops Meter Calibration Kit Model 571 has been taken prior to shipping this source back to Tech Ops. Effective immediately.

Item H - 10 CFR 71.5 Transporting of Radioactive Material

ARS was not aware of the time limit required by licensee's to convert to Type B packaging to be in compliance with 49 CFR 173.394(B).

ARS has purchased two Type B container for transporting Type B quantities of special form radioactive materials. Effective immediately.

Item I - 10 CFR 34.27 Utilization Logs

This item of noncompliance has been answered in my letter to the NRS dated October 9, 1979, Docket No. 30-08048/79-01.

Item J - 10 CFR 20.401(G) Records and Surveys, Radiation Monitoring and Disposals

Advanced Radiation Service, Ince did not order or receive any quantities of cobalt 60 on the date specified . ARS does not own or possess any cobalt-60.

Should you have any questions concerning this letter, please do not hesitate to contact us.

Very truly yours,

Anton S. Kurtz

President