



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
789 ROOSEVELT ROAD
GLZEN ELLYN, ILLINOIS 60137

INSPECTION REPORT NO. 2801

RS HOLDING, INC.
(Licensee name/address)
18530 SOUTH MILES PARKWAY
CLEVELAND, OHIO 44128

Telephone No: 216-475-3434

License No. 34-18156-01
SNM-1826

BASIC LICENSE 6-28-78
Last amendment & date: BASIC LIC. 6-28-78

Docket No. _____
Category: E & Priority: A, as of last amendment.

Inspection date(s): 7-28-78 Type of inspection: UNANNOUNCED INITIAL

Attached

- () Appendix A
() Appendix B
() Appendix C
() Memo

SUMMARY OF FINDINGS AND ACTION

- ☒ No noncompliance, clear 591 () Noncompliance, 591 issued
() Noncompliance, Appendix A () Regional action () Hq action
() Action on previous n/c, App B () Supplemental info, App C

RECOMMENDATIONS

See basis in Appendix C or attached memo.

- () Change Category to: _____ () Change Priority to: _____
() Next inspection date: _____

PERSONS CONTACTED
(NAME AND TITLE)

GEORGE PAUKO, RSO & V.P. OF MFG.

* Indicates those attending management meetings

Inspector: William H. Schultz
(signature)

8-4-78
(date signed)

Approved: Julius R. Rasmussen
(signature)

8-7-78
(date signed)

INSPECTION PLAN AND REPORT NUMBER 7801

PLANNING SHEET

Date: _____

Licensee: RS HOLDING, INC.License no: 54-18156-01

Inspection Items	Scheduled for inspection	Post-inspection status	Module no.	766 Time Info
Management meeting - Entrance and Exit Interviews [REQUIRED]	✓	Comp	30703B	
Initial Management Meeting			30800B	
Program requirements, MC 28 [REQUIRED]	✓	Comp	77710B	
Licensee Event Followup			92700B	
Followup on Inspector-identified problems			92701B	
Followup on Noncompliance and Deviations			92702B	
IE Bulletin/Immediate Action Letter Followup			92703B	
Followup on Headquarters Requests			92704B	
Followup on Regional Requests			92705B	
Independent Inspection Effort [REQUIRED]	✓	Comp	92706B	
Inspector Dispatched to Site			93700B	
Followup on Significant Event Occurring During Inspection			93701B	

INSPECTION PLAN AND REPORT NUMBER 7801

PLANNING SHEET

Date: _____

Licensee: RS HOLDING INC.License no: SNM-1826

Inspection Items	Scheduled for inspection	Post-inspection status	Module no.	766 Time Info
Management meeting - Entrance and Exit Interviews (REQUIRED)	✓	Comp	30703B	
Initial Management Meeting			30800B	
Program requirements, MC 2B (REQUIRED)	✓	Comp	77710B	
Licensee Event Followup			92700B	
Followup on Inspector-identified problems			92701B	
Followup on Noncompliance and Deviations			92702B	
IE Bulletin/Immediate Action Letter Followup			92703B	
Followup on Headquarters Requests			92704B	
Followup on Regional Requests			92705B	
Independent Inspection Effort (REQUIRED)	✓	Comp	92706B	
Inspector Dispatched to Site			93700B	
Followup on Significant Event Occurring During Inspection			93701B	

INDUSTRIAL - ACADEMIC INSPECTION REPORT

Licensee: RS HOLDING, INC Lic. No. 3A-18156-01 Amend. No. BASIC LIC.
 Date of Inspection: 7-28-70 Lic. No. SNM-1826 Amendment No. BASIC LICENSE

1. INSPECTION HISTORY

a. Items of noncompliance or safety items noted during last inspection

conducted on INITIAL INSPECTION Yes _____ No N/A

b. Requirement

Corrected

Not Corrected

c. If any items of noncompliance or safety items noted during the last inspection were not corrected, explain: _____

2. ORGANIZATION

a. Organizational structure as described in application or letter

Dated _____, or SEE BELOWb. List primary licensee contact: GEORGE PALKO, RSO Telephone No.: 216 475-3434

c. Comment: _____

ROBERT A. KEMPE, PRESIDENTGEORGE PALKO, V.P. MFG. & RSONOTE: SEE PAGE 13, PARAGRAPH 22

3. SUMMARY OF LICENSED PROGRAM (Kind of program, number of people, rate of use or quantities on hand, places and frequency of use, type, quantity and use as authorized).

(LIC. NO. 34-18156-01) SMALL PROGRAM INVOLVING USE OF SMALL SEALED SOURCES FOR QC & CALIBRATION OF DETECTORS. ALSO USES AN H^3 FOIL IN A GAS CHROMATOGRAPH. A NOMINAL 10 CURIE Co^{60} SOURCE IS USED IN CALIBRATION FACILITY IN BASEMENT.

(LIC. NO. SNM-1826) SMALL PROGRAM INVOLVES PLATING OF MICROGRAM QUANTITIES OF U^{235} ON COMPONENTS OF DETECTORS. ALSO HAS A SMALL $Pu-Bz$ SOURCE FOR CALIBRATION. ALL USES & QUANTITIES AS AUTH.

Category and priority of this license is appropriate: Yes ☒ No ☐

If "No" state new Category _____ Priority _____.

4. INTERNAL AUDITS OR INSPECTIONS

a. Required by L/C or application: Yes _____ No ☒ If "Yes":

1) By whom _____

2) Frequency _____ Announced: _____ Unannounced: _____

3) Scope _____

4) Records maintained: Yes _____ No _____

5) Records reviewed: Yes _____ No _____

6) Period Reviewed: _____

b. Comment (responsibility of auditor or committee, management control): _____

5. TRAINING RETRAINING AND INSTRUCTION TO WORKERS

a. Training program specified in L/C or application: Yes ☒ No ☐

b. If training program is required, describe scope of program: _____

INITIAL 12 HOURS OF BASIC RADIOLOGICAL SAFETY ORIENTATION
PLUS ON-THE-JOB TRAINING

c. Retraining required: Yes ☒ No ☐

If "Yes" is retraining: Complete _____ Incomplete N/A {NEW LICENSE JUST ISSUED}

1) Are tests and/or examinations required: Yes _____ No _____

2) If "Yes" are records available: Yes _____ No _____

3) Reviewed test results: Yes _____ No _____

4) Period reviewed: _____

5) Comment (per cent completed, test results, etc.): _____

d. Training provided, but not covered above: _____

e. Instructions to workers in accord with 10CFR 19.12: Yes ☒ No ☐

6. RADIOLOGICAL PROTECTION PROCEDURES

a. Operating and emergency procedures

- 1) Required by L/C or application: Yes ✓ No _____
- 2) Provided, but not required by L/C or application: Yes _____ No _____
- 3) Procedures reviewed: Yes ✓ No _____
- 4) Appeared Adequate: Yes ✓ No _____
- 5) Comments (personnel's understanding of procedures): _____

b. Changes in procedures since last inspection: Yes _____ No N/A - NEW
LICENSE

- 1) Were changes authorized: Yes _____ No _____
- 2) Comments: _____

7. INSTRUMENTATION

a. Type(s) of radiation survey instruments on hand as per L/C, application or equivalent: Yes ✓ No _____

- 1) If "No" list changes: _____

b. Capability of radiation survey instruments adequate for program:

Yes ☒ No ☐

c. Calibration of instruments required: Yes ☒ No ☐

d. If "Yes" instruments calibrated in accord with requirements:

Yes ☒ No ☐

e. Comment: _____

8. MATERIALS

a. Radioactive material secured to prevent unauthorized removal from:

1) Restricted area: Yes ☒ No ☐

2) Unrestricted area (20.207): Yes ☐ No N/A

b. Method of control appears adequate: Yes ☒ No ☐

c. Comment: _____

9. FACILITIES

a. Facilities described in letter or application: ^{DATED 3-23-78} Yes ☒ No ☐

b. Facilities inspected: Yes ☐ No ☐

c. Comment: _____

10. POSTING AND LABELING

a. Posting and labeling in accord with 10CFR 20.203: Yes ☒ No ☐

b. Comment: _____

11. RECEIPT AND TRANSFER OF MATERIAL

a. Procedures for picking up and receiving packages (10CFR 20.205 (b)(c)):

Yes ☒ No ☐

1) Incoming shipments monitored: Yes ☒ No ☐

2) Records of monitoring maintained (10CFR 20.401(b)): Yes ☒ No ☐

3) Records reviewed by NRC inspector: Yes ☒ No ☐

4) Period reviewed: 6-28-78 TO 7-28-78

b. Procedures for opening packages (10CFR 20.205(d)): Yes ☒ No ☐

c. Comment: _____

d. Records of receipt and transfer of material available (30.51(a); 40.61(a);

70.51(b)(1)): Yes ☒ No ☐

1) If "Yes" review of records was made by inspector: Yes ☒ No ☐

2) Period Reviewed: 6-28-78 TO 7-28-78

3) Comments: _____

e. Packages on hand meet labelling requirements (49CFR 173.399):

Yes ☒ No ☐

Comments: _____

f. Reports to commission required by L/C or regulation submitted:

Yes ☒ No ☐

Comments: _____

12. PERSONNEL RADIATION PROTECTION - EXTERNAL

a. Film or TLD badge supplier SEARLE ANALYTIC

b. Badge exchange frequency MONTHLY

c. Reports reviewed by G. PAUKO

e. Records reviewed for period JAN 77 to 6-1-78 by NRC inspector

f. NRC forms or equivalent

1) NRC-4 (20.102(b)): Yes ☐ No ☒ Complete: Yes ☐ No ☐

2) NRC-5 (20.401(a)): Yes ☒ No ☐ Complete: Yes ☐ No ☐

Maximum whole body ^{ANNUAL} ~~quarterly~~ exposure: 250 mREM { INCLUDES EXPOSURE FROM PROGRAM UNDER LIC. NO. 34-08311-01 }

Maximum extremity quarterly exposure: N/A NOT MONITORED

3) Comment: _____

g. Pocket dosimeters used: Yes _____ No ☒

1) Type used: _____
2) Frequency of recharging: _____
3) Frequency of reading: _____
4) Comment: _____

h. Direct radiation surveys of restricted and/or unrestricted areas being made:

Yes ☒ No _____

1) Records of surveys being maintained: Yes ☒ No _____

2) Records of surveys reviewed: Yes ☒ No _____

3) Period reviewed: 6-28-78 TO 7-28-78

4) Comments: _____

13. PERSONNEL RADIATION PROTECTION - INTERNAL

a. Potential for exposure of individuals to airborne radioactive materials

exists: Yes _____ No ☒

1) If "Yes" does program for monitoring and control exist: Yes _____ No _____

2) Program for monitoring and control appears adequate: Yes _____ No _____

b. Comments: _____

c. Respiratory protection program required by L/C or application:

Yes _____ No ✓

1) If "Yes" were respiratory protection procedures reviewed:

Yes _____ No _____

2) Respiratory protection procedures appear adequate: Yes _____ No _____

3) Comments: _____

d. Bioassay program required: Yes _____ No ✓

1) If "Yes" was bioassay program reviewed: Yes _____ No _____

2) Bioassay program appear sdequate: Yes _____ No _____

3) Comments: _____

e. Smears and air samples

1) Monitoring for airborne radioactivity is conducted (20.103):

Yes _____ No ✓

a. Records of monitoring reviewed: Yes _____ No _____

b. Period reviewed: _____

c. Records of monitoring appears adequate: Yes _____ No _____

2) Smear surveys being conducted (20.201, b): Yes ✓ No _____

a. Records of smear surveys reviewed: Yes ✓ No _____

b. Period reviewed: JUNE 28, 1978 TO JULY 28, 1978

c. Records appeared adequate: Yes ✓ No _____

3) Comments: _____

14. LEAK TESTS

- a. Leak tests required: Yes ☒ No ☐
- b. If "Yes" leak tests conducted: Yes ☒ No ☐
- c. Records of leak tests maintained: Yes ☒ No ☐
- d. Leak tests records reviewed: Yes ☒ No ☐
- e. Period reviewed: 6-28-78 To 7-28-78
- f. Records of leak tests appear adequate: Yes ☒ No ☐
- g. Comments: _____

15. RADIOACTIVE EFFLUENT CONTROL AND WASTE DISPOSAL

- a. Byproduct material released to atmosphere and/or sewer (20.106 and 20.303):
Yes _____ No ☒
- b. Records of releases or radioactive effluents maintained (20.401):
Yes _____ No _____
- 1) Period reviewed: _____
- 2) Records appear adequate: Yes _____ No _____
- c. Solid waste disposal method: TRANSFER TO LICENSED AGENCY
- 1) Records of disposal maintained (30.51): Yes _____ No N/A NONE TRANSFERRED THUS FAR
- 2) Surveys of waste prior to disposal made (20.201): Yes _____ No _____
- 3) Period reviewed: _____
- 4) Records of surveys appear adequate (20.401): Yes _____ No _____
- d. Comments: _____

16. SHIPPING INCIDENTS

a. Have any shipping incidents occurred since (date) NONE

1) Was incident documented: Yes _____ No _____

2) If "Yes" documentation appears adequate: Yes _____ No _____

b. Comments (reports to DOT, etc.): _____

17. NOTIFICATIONS AND REPORTS

a. Licensee in compliance with 10CFR 19.13 (reports to individuals):

Yes _____ No N/A

b. Licensee in compliance with 10CFR 20.405 (over exposures):

Yes _____ No N/A

c. Licensee in compliance with 10CFR 20.403 (incidents):

Yes _____ No N/A

d. Licensee in compliance with 10CFR 20.402 (theft or loss):

Yes _____ No N/A

e. Comments: _____

18. POSTING OF NOTICES

- a. Licensee in compliance with 10CFR 19.11(a) or (b): Yes ☒ No ☐
- b. Licensee in compliance with 10CFR 19.11(c): Yes ☒ No ☐
- c. Comments: _____

19. ENVIRONMENTAL MONITORING PROGRAM

- a. Environmental Monitoring Program required: Yes ☐ No ☒
- b. If "Yes" records reviewed: Yes ☐ No ☐
- c. Period reviewed: _____
- d. Records appeared adequate: Yes ☐ No ☐
- e. If Environmental Program is not required, briefly describe any existing program: _____

20. CONFIRMATORY MEASUREMENTS

- a. Independent measurements made by inspector: Yes ☐ No ☒
- b. Comments (describe type, results, comparison with licensee results): _____

21. INDEPENDENT INSPECTION EFFORT

a. Comment on type of independent inspection effort conducted: _____

WALK-THRU ALL FACILITIES

22. CONTINUATION FROM PREVIOUS PARAGRAPHS - USE BACK OF PAGE IF NECESSARY

(PAR. 2 C CONTINUED)

ALL ASSETS OF REUTER-STOKES, INC. WERE PURCHASED
BY RS HOLDING, INC. ALTHOUGH THERE WAS NO CHANGE
IN THE FACILITIES, EQUIPMENT, PROGRAM OR PERSONNEL
LICENSING CHOSE TO ISSUE 2 NEW LICENSES COVER-
ING THESE 2 LICENSED PROGRAMS. LICENSE NO.
34-08311-01 ISSUED TO REUTER-STOKES WAS REPLACED
BY LICENSE NO. 34-18156-01 ISSUED TO RS HOLDING, INC.
ON 6-28-78. ALSO, LICENSE NO. SNM-268 ISSUED
TO REUTER-STOKES WAS REPLACED BY LICENSE NO.
SNM-1826 ISSUED TO RS HOLDING, INC. ON 6-28-78.
ALSO, ON 6-28-78 AMENDMENT NO. 2 TO LICENSE NO.
SNM-268 WAS ISSUED. THIS AMENDMENT TERMINATED
LICENSE NO. SNM-268. HOWEVER, LICENSING DID NOT
ISSUE AN AMENDMENT WHICH TERMINATED LICENSE
NO. 34-08311-01.

reuter **RS** stokes

HC file (68)

18530 South Miles Parkway, Cleveland, Ohio 44128 U.S.A • Telephone (216) 475-3434, Telex 98-5253

September 28, 1979

Mr. James G. Keppler
U.S.N.R.C.
Office of Inspection and Enforcement
Washington, D. C. 20555

Dear Sir:

In accordance with IE Bulletin No. 79-19, Packaging of Low-Level Radioactive Waste for Transport and Burial, we submit the following data concerning action taken or to be taken by Reuter-Stokes to assure the safe transfer, packaging and transport of low-level radioactive waste.

1. A current set of DOT and NRC applicable regulations is maintained both by the Radiation Safety Officer and the Reuter-Stokes Traffic Manager.
2. For our waste collection and disposal we contract with Nuclear Engineering Company, Inc., Louisville, Kentucky. A set of requirements from NECO is available at our facility.
3. As Radiation Safety Officer, I have been designated, in writing, as the person responsible for the safe transfer, packaging and transport of low level radioactive material. Assisting me are Robert Callihan, Traffic Manager, and C. Hubbard Ford, Assistant Radiation Safety Officer and Nuclear Test Supervisor.
- 4. Detailed instructions and operating procedures will be prepared, with completion set for January 1, 1980.
- 5. A training and retraining schedule will be maintained in conjunction with our present license requirement for training of personnel. A record as required will be maintained for inspection purposes. *one individual handles waste shipment.*
6. We have but one employee, Clark Gerber, who generates low-level waste in plant, and he is and will continue to be informed of all regulations and directives concerning levels of waste and their acceptable chemical and physical form.
- 7. We will establish a management controlled audit function to ensure compliance with all regulatory requirements. Since we have low-level wastes disposed of about once per year, the audit will be performed on an annual basis.
- 8. A management controlled audit will be performed on October 8, 1979, to review the disposal records for the past twelve months.

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OCT 9 1979

U.S.N.R.C.
Mr. James G. Keppler

September 28, 1979
Page Two

9. In addition to the above schedules, we submit the following low-level waste shipping information.
- A. Two low-level radioactive waste shipments were made from January 1, 1980 to the present date. The first, shipped March 3, 1978, contained 2 grams in a 4 cubic foot drum; and the second, shipped March 27, 1979, contained 1.5 grams in a 4 cubic foot drum.
 - B. The first shipment contained 0.02 millicuries of Np-237, and 0.004 millicuries of U-235. The second shipment contained 0.0032 millicuries of U-235. Copies of our radioactive shipment records are attached.
 - C. Liquid low-level waste (U-235) is generated in our facility, however, all liquid is evaporated into solid crystals prior to packaging.

Yours truly,

REUTER-STOKES, INC.



George Palko
Vice President, Manufacturing
Radiation Safety Officer

GP:jw

Enclosures

☐ P.O. Box 158
Sheffield, Illinois 61361
(815) 454-2624



NUCLEAR ENGINEERING COMPANY, INC.
P.O. Box 7246 • Louisville, Kentucky 40207
(502) 426-7160

☐ P.O. Box 578
Beatty, Nevada 89003
San Ramon (415) 837-1561

☐ P.O. Box 638
Richland, Washington 99352
San Ramon (415) 837-1561

RADIOACTIVE SHIPMENT RECORD

26022

Western Operations Headquarters
P.O. Box 156
San Ramon, California 94583
(415) 837-1561

Please complete this form for each shipment and distribute as marked.

DATE 3-27-49

Page 1 of 1 Pages

CARRIER (CONSOLIDATED) FREIGHTWAYS


MATERIAL DESCRIPTION General Use Wastes

CONTAINER DESCRIPTION	30 gal. drum DOT-R-1117
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Item No.	Cubic Feet	Gallons Liquid	Physical State	Chemical Form	mRem/hr @ surface	mRem/hr @ 3 ft.	Isotopes	Transport Groups	By-Product (millicuries)	Source Lbs.	SNM grams	Label Used
1	4.0	--	Solid	Oxide & Nitrate	0.1	0.08	U-235	III	3.2×10^{-3}	--	1.5	Unit 1 Oxidizer
TOTALS									TOTALS			

This is to certify that the above named articles are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. It is also certified that the articles are in compliance with all regulations applicable at the designated disposal site.

CUSTOMER COPY

Reverse  Terms and Conditions

3 11 77
Date

Autologous Signature

Materials Manager
Title

Tied

INSTRUC (606) 784 1
P.O. Box 156
Sheffield, Illinois 61361
(815) 454-2624

NEAD
P.O. Box 7246
(502) 426-7160
Louisville, Kentucky 40207

☐ P.O. Box 578
Beatty, Nevada 89931
San Ramon 837-1561
☒ P.O. Box 638
Richland, Washington 99352
San Ramon (415) 837-1561

RADIOACTIVE SHIPMENT RECORD

17314

Western Operations Headquarters
P.O. Box 156
San Ramon, California 94583
(415) 837-1561

Please complete this form for each shipment and distribute as marked.

CUSTOMER Reuter-Stokes, Inc. DATE February 3, 1978 Page 1 of 1 Pages
ADDRESS 12530 South Miles Hwy., Cleveland, Ohio - 44128 CARRIER Consolidated Freightways
MATERIAL DESCRIPTION See Below CONTAINER DESCRIPTION TYPE-B-117 (DOT-17H)

Item No.	Cubic Feet	Gallons Liquid	Physical State	Chemical Form	mRem/hr @ surface	mRem/hr @ 3 ft.	Isotopes	Transport Groups	By-Product (millicuries)	Source Lbs.	SNM grams	Label Used
A			Solid	U ₂ O ₈			Np-237	I	.020	N/A	.03	WH-101
B			Solid	Oxide/Nitrate			U-235	III	.004	N/A	1.74	71 AND WH-101
					1.3	0.12						
TOTALS							TOTALS					

This is to certify that the above named articles are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. It is also certified that the articles are in compliance with all regulations applicable at the designated disposal site.

DRIVER'S COPY
Reverse side: Terms and Conditions

Feb. 3, 1978
Date

George Palto
Authorized Signature

George Palto, Radiation Safety Officer

JUL 10 1981

(69)

Reuter-Stokes, Inc.
ATTN: Mr. George Palko
Vice President
18530 South Miles Parkway
Cleveland, OH 44128

License No. 34-18233-01
License No. 34-18156-01
License No. SNM-1826

Gentlemen:

This refers to the routine safety inspection conducted by Mr. W. J. Slawinski of this office on June 24 and 25, 1981, of activities at Reuter-Stokes, Inc. authorized by NRC Material Licenses No. 34-18233-01, No. 34-18156-01 and No. SNM-1826 and to the discussion of our findings with you at the conclusion of the inspection and telephone conversation on July 1, 1981.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of a selective examination of procedures and representative records, observations, independent measurements, and interviews with personnel.

No items of noncompliance with NRC requirements were identified during the course of this inspection of License No. SNM-1826.

However, during the inspection of Licenses No. 34-18156-01 and No. 34-18233-01, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the enclosed Appendix A. With respect to Item No. 4, the inspection showed that action had been taken to correct the identified noncompliance and to prevent recurrence. Consequently, no reply to this item of noncompliance is required and we have no further questions regarding this matter at this time.

Regarding the remaining Items, a written response, submitted under oath or affirmation is required.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

D. J. Sreniawski, Chief
Materials Radiation Protection
Section 2

Enclosure: Appendix A,
Notice of Violation

cc w/encl:
DMB/Document Control Desk (RIDS)
RIII RIII

Slawinski/db Sreniawski
7/7/81

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JES

Appendix ANOTICE OF VIOLATION

Reuter-Stokes, Inc.

License No. 34-18156-01

License No. 34-18233-01

As a result of the inspection conducted on June 24 and 25, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. Condition 13 of License No. 34-18156-01 requires that your method of testing sealed sources for leakage and/or contamination be capable of detecting the presence of 0.005 microcuries of radioactive material on the test sample.

Contrary to this requirement, as of the day of the inspection, June 25, 1981, you were not able to demonstrate that your procedure for analyzing wipe tests of beta and/or gamma emitting material is adequate to detect the presence of 0.005 microcuries of radioactive material on the test sample. Specifically your calibration was for alpha emitters.

This is a Severity Level V violation (Supplement VII).

2. Condition 18 of License No. 34-18233-01 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in various dated letters and applications. Letter dated January 9, 1978, page 39, states that a radiological survey will be performed, once a week, in and around the storage area in the radioactive material storage room.

Contrary to this requirement, radiological surveys have not been performed in the radioactive material storage room since inception of the program.

This is a Severity Level V violation (Supplement VII).

3. Condition 14 of license No. 34-18233-01 requires that you test your sealed sources containing licensed material for leakage and/or contamination at intervals not to exceed six months.

Contrary to this requirement, you have not tested your "safety ray" sources containing americium-241 for contamination or leakage every six months. Specifically, five sealed sources purchased from New England Nuclear have not been leak tested since received in May 1979.

This is a Severity Level V violation (Supplement VII).

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Appendix A

- 2 -

4. 10 CFR 20.203(e) requires that rooms in which specified amounts of licensed material is used or stored be conspicuously posted "Caution Radioactive Material."

Contrary to this requirement, as of June 24, 1981, you failed to post the outside door leading to the radioactive material storage room.

This is a Severity Level V violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

Date

D. J. Sreniawski, Chief
Materials Radiation Protection
Section 2