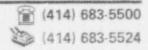
Pane



Red Arrow Products Company Inc.

Post Office Box 1537 Manitowoc, WI 54221-1537



March 15, 1993

U.S. Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, IL 60137

"Reply to a Notice of Violation"

In response to Docket No. 030-32666, which was mailed on February 26, 1993, Red Arrow Products will not contest the violations that were listed.

In response to violation (1) a misunderstanding between Red Arrow Products and the installation contractor took place. We had assumed his license was current and would be accepted in the United States. The corrective steps taken are attached. (See Attachment A) Red Arrow Products will also be filing an amendment to License No. 48-26386-01. This will allow our on-site Radiation Officer to install, relocate, and do leak testing on the gauges we presently use. The safety training course will be conducted May 2-7, 1993, in Austin, Texas.

In response to Violation 2, we considered the control room to be a restricted area and the cabinet where the gauging device was stored, and because of the technical equipment involved, this was limited to only a small number of operators and electricians. The gauging device has been removed and placed in a container under lock and key. The container has been labeled "Radioactive II". The key is under the control of the Safety Director. This action was taken immediately upon receipt of the violation notice. This device will remain under lock and key until our license amendment is approved and the Industrial Radiation Safety Course has been completed.

LTS93004

9304140051 930408 PDR ADDCK 03032666 C PDR March 11, 1993

Mr. Larry TeStroete Red Arrow Products 1226 S. Water Street Manitowoc, WI 54220

Dear Mr. TeStroete:

Confirming our phone conversation, I have reserved space for you in the Industrial Radiation Safety Training Course to be conducted the week of May 3rd.

The enclosed material will provide general information on the class and its content. Please complete and return the registration form along with your check or purchase order. Confirming information will be mailed approximately three weeks prior to the class.

As we discussed, this training is applicable to users of all nuclear gauging devices, and is a must for Radiation Safety Officers and individual wanting to obtain license authorization to install, relocate and leak test nuclear gauges.

We look forward to your participation in this class. Please don't hesitate to call if I can provide additional information or assistance.

Sincerely,

TN TECHNOLOGIES, INC.

Pam Zelewski

Training Coordinator

18

Enc.

TN Technologies, Inc.

An Envirollech company

P.O. Box 800 Round Rock, Texas, 78680-0800 (512) 388-9100 Fax, (512) 388-9200 Telex, 77-6413

INDUSTRIAL RADIATION SAFETY

ARE YOU:

- Confused and overworked trying to understand and comply with everincreasing regulations and licensing requirements?
- Unsure about how to set up an acceptable Radiation Safety Program?
- At a loss about how to train workers, maintain records and post areas?
- Afraid to even think about a regulatory inspection?

Then you need to attend TN Technologies, Inc. (formerly Texas Nuclear Corporation) 40 hour Industrial Radiation Safety Training Course.

TN Technologies, Inc. (TN) located in Round Rock, Texas has been a leader in the field of radiation and radiation safety for the past thirty years, and our commitment to customer satisfaction keeps us constantly growing. The Industrial Radiation Safety Training Course has evolved as interest in the field of radiation safety has increased and as regulatory requirements for training have become more stringent. Consistent development of the course during the past twenty years has established it as one of the best in the field. Our Radiation Safety Course is recognized by industry authorities as a standard by which to judge other courses. Likewise, the Course Instructors have been recognized throughout the industry and the regulatory world for their expertise.

WHO SHOULD ATTEND:

- Radiation Safety Personnel
- Regulatory Affairs Managers
- Plant Managers
- Industrial Hygienists
- Individuals wanting to obtain license authorization to install and relocate gauging devices.

TN Technologies, Inc.

A Вами живтин интракс

The Radiation Safety Course is applicable to users of all nuclear gauging devices. It is designed to minimize factory assistance by providing information on topics including radiation physics, radiation detection and protection, dosimetry, licensing and regulatory compliance requirements. Participants also study gauge installation, relocation, surveying and leak testing and receive actual hands-on training performing these activities in our factory.

Each class is limited to thirty students, allowing for maximum participation and ample time to practice new skills. These smaller classes also allow students to obtain valuable feedback from instructors on specific areas of interest or concern. Students are encouraged to work together on study assignments and take-home quizzes. Homework is assigned each night.

The flexibility of course scheduling allows you to select a class time which best fits your needs. Classes are conducted four times each year in Austin, Texas.

Alternatively, we can conduct this course or an abbreviated version at your facility, tailoring the training to meet your specific needs.

The registration fee includes tuition, study and reference materials, and luncheon each day. For additional information, contact Pam Zelewski at (512) 388-9286.

The Industrial Radiation safety Course has been evaluated and approved by The University of Texas at Austin for 3.4 continuing education units (CEU's). TN will pay the fees to UT for participants wishing to obtain CEU certificates. The course has also been approved for 3.5 CM points through the American Board of Industrial Hygiene.

on the same throughout and the

*****	******	*******	**************************************			
*********	RADIATION SAF		NG ***************************			
For reservations	, complete and return this for TN Technolo Attn: Pam P. O. B Round Rock, Ti	gies, Inc. Zelewski ox 800	r check or purchase order to:			
Check Number:	P	irchase Ord	ler Number: 020084			
CHECK NUMBER		please encl				
Registration	Fee:					
XX	40 Hour Course - \$1075.	00 per pe	erson (Includes tuition,			
	seminar materials and 1	unch)	per person (Includes			
Management of the Park of	Technical Math Review - \$150.00 per person (Includes scientific calculator)					
Radiation	al math review will be taught a Safety Training Course. This	is a revie	w of the technical math skills			
Radiation needed to desire a n numbers, s calculation	Safety Training Course. This complete the training course eview of skills used in dealing igned numbers, etc. A scient.	is a revie and is inte ng with sci	lay afternoon preceding the ew of the technical math skills ended for those participants who entific notation, exponential ator (provided) is used for all			
Radiation needed to desire a numbers,	Safety Training Course. This complete the training course seview of skills used in dealingned numbers, etc. A scient ons.	is a revie and is inte ng with sci	ew of the technical math skills anded for those participants who entific notation, exponential ator (provided) is used for all			
Radiation needed to desire a n numbers, s calculation	Safety Training Course. This complete the training course eview of skills used in dealing igned numbers, etc. A scient.	is a revie and is inte ng with sci	ow of the technical math skills ended for those participants who entific notation, exponential			
Radiation needed to desire a r numbers, r calculation Dates: XX Single roo Botel, with If you recommended to	Safety Training Course. This complete the training course review of skills used in dealing and numbers, etc. A scient ons. January 24-29, 1993 May 2-7, 1993 om reservations will be made for	is a revie	August 8-13, 1993 November 7-12, 1993 rticipant at the Stouffer Austin			
Radiation needed to desire a r numbers, r calculation Dates: XX Single roo Botel, with If you recommended to	Safety Training Course. This complete the training course review of skills used in dealing igned numbers, etc. A scient ons. January 24-29, 1993 May 2-7, 1993 om reservations will be made for the check-in guaranteed for latituire alterations in these res	is a revie	August 8-13, 1993 November 7-12, 1993 rticipant at the Stouffer Austin please call cur office.			
Radiation needed to desire a r numbers, r calculation Dates: XX Single roo Rotel, with If you rec NAME: LARRY	Safety Training Course. This complete the training course review of skills used in dealing igned numbers, etc. A scient ons. January 24-29, 1993 May 2-7, 1993 om reservations will be made for the check-in guaranteed for latituire alterations in these res	is a reviewed is intended in intended i	August 8-13, 1993 November 7-12, 1993 rticipant at the Stouffer Austin please call cur office.			

Enrollment in each course is limited to 30.

3.4 CEU's awarded upon request by The College of Education, University of Texas at Austin. This course has been approved for 3.5 CM points by the American Board of Industrial Hygiene.

TN Technologies, Inc.



Red Arrow Products Co. Inc.

Post Office Box 1537 Manitowoc, WI 54221-1537 (414) 683-5500

(414) 683-5524

PURCHASE ORDER

PURCHASE ORDER NO.

PURCHASE ORDER DATE

SHIP TO:

RED ARROW PRODUCTS OF INC. 633 S 20TH STREET

MARITOWOO

14 7

PAGE

SHIP VIA	F.O.B. TERMS		BUYER CONFIRM TO CERT.		SATE DECOMPOSEDED SECURIOR SEC	
INVENTORY ID	PROMISED DATE	REQUIRED DATE	4 UNIT	QUANTITY	UNIT PRICE	EXTENDED PRICE
000 RESERVATION MAY 2-7	FOR RADIA	TION SAFET	000000 Y TRAIK		1075.000	1075.0

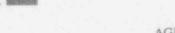
White - VENDOR

Canary - RECEIVING REPORT

Pink - ACCOUNTS PAYABLE White - PURCHASING

TOTAL

AUTHORIZED SIGNATURE



AGENDA TN TECHNOLOGIES, INC. RADIATION SAFETY TRAINING COURSE

Radioactive Materials

100			
A.	Finn	8000	Philippin .
19	180	15.0.76	3855

B. Decay

C. Half-life

Types of Radiation

Radiation Interaction with Matter

A. Ionizing Radiation

- 1. Electromagnetic
- 2. Charged Particle
- 3. Neutron
- B. Specific Ionization

Radiation Dosimetry

- Definitions and units of Dose
- B. Quality Factor
- C. Gamma Exposure Rate
- D. Neutron Exposure Rate

Distance, Time, Shielding

- A. Inverse Square Law
- B. Half-Value layer

Biological Effects

- A. Dose limits
- B. Radiation Protection Guides

Radiation Detection

A. Detection Instruments

- Basic Operation
- 2. Survey Meters

TN Technologies, Inc.

Radiation Safety Training Course Agenda Page 2

Personnel Monitoring

Working Definitions

Preparation for Laboratory

- A. Form Review
- B. Team Assignment
- C. Surveying and Leak Testing Demonstration

Laboratory Work

- A. Check-out and re-briefing on use of portable radiation survey meters
- B. Prepare Survey Forms
- C. Leak Test Devices using QT/1S Procedure
- D. Count Swabs
- E. Prepare Leak Test Certificates

Regulatory Control

- A. Title 10 Code of Federal regulations
- B. Agreement States
- C. Licensing Procedures
- D. Purpose of Licensing
- E. User Responsibility
- F. Radiation Areas and Posting

Shipping Radioactive Material

Occupational Safety & Health Act

Emergency Procedures

- A. Guidelines
- B. Fire or Explosion
- C. Incident Report

Summary of Topics

- A. Role of Radiation Safety Personnel
- B. Class Discussion

Written Test on Lectures and Homework Assignments

Note: Homework is assigned each night during the course.