

*Paul*



## Red Arrow Products Company Inc.

Post Office Box 1537

Manitowoc, WI 54221-1537



(414) 683-5500



(414) 683-5524

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 ADOCK 03032666  
C PDR

MAR 22 1993

TN

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

/s  
Enc.

*TN Technologies, Inc.*  
An EnvidTech 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 ever-increasing 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.

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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.

\*\*\*\*\*  
RADIATION SAFETY TRAINING  
\*\*\*\*\*

For reservations, complete and return this form with your check or purchase order to:  
TN Technologies, Inc.  
Attn: Pam Zelewski  
P. O. Box 800  
Round Rock, TX 78680-0800

Check Number: \_\_\_\_\_

Purchase Order Number: 020084  
(please enclose copy)

Registration Fee:

XX 40 Hour Course - \$1075.00 per person (Includes tuition,  
seminar materials and lunch)  
\_\_\_\_\_ Technical Math Review - \$150.00 per person (Includes  
scientific calculator)

A technical math review will be taught on the Sunday afternoon preceding the Radiation Safety Training Course. This is a review of the technical math skills needed to complete the training course and is intended for those participants who desire a review of skills used in dealing with scientific notation, exponential numbers, signed numbers, etc. A scientific calculator (provided) is used for all calculations.

Dates:

XX January 24-29, 1993  
May 2-7, 1993

\_\_\_\_\_ August 8-13, 1993  
November 7-12, 1993

Single room reservations will be made for each participant at the Stouffer Austin Hotel, with check-in guaranteed for late arrival on Sunday, and check out on Friday. If you require alterations in these reservations, please call our office.

NAME: LARRY TE STROETE

TITLE: SAFETY DIRECTOR

NAME: \_\_\_\_\_

TITLE: \_\_\_\_\_

COMPANY: RED ARROW PRODUCTS COMPANY

PHONE: 414 - 683 - 5500

ADDRESS: 633 S. 20th Street

CITY/ST/ZIP Manitowoc, WI 54220

Refunds for cancellation will be made in full up to three (3) weeks before the course. Partial refunds can be made for cancellations received after that date. Substitutions may be made at any time by calling 512/388-9286.

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.*  
An Envirotech company

P.O. Box 800 Round Rock, Texas 78680-0800  
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AUTHORIZED SIGNATURE



AGENDA  
TN TECHNOLOGIES, INC.  
RADIATION SAFETY TRAINING COURSE

Radioactive Materials

- A. Isotopes
- 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

- A. 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
  - 1. Basic Operation
  - 2. Survey Meters

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## Radiation Safety Training Course

### Agenda

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#### 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/IS 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.