



Chevron Research Company

A Standard Oil Company of California Subsidiary
576 Standard Avenue, Richmond, CA 94802

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January 25, 1982

L. P. Lindeman
Manager
Analytical Research and
Services Division

REGION V

NRC Inspection of
License No. 04-00720-7E
HEB-LPL - 1-6-82

Mr. H. E. Book, Chief
Radiological Safety Branch
U.S. NRC
1450 Maria Lane, Suite 260
Walnut Creek, California 94596

Dear Mr. Book:

This is in reply to the requirements of 10 CFR 2.201 pertaining to the item of noncompliance in Appendix A of your above-cited letter.

The violation pertained to failure to conduct containment tests for loss of ^{63}Ni from electron capture detector cells used in the Chevron Leak Detector Kit, Model 10. Failure to perform was inadvertent, but rather these tests were overlooked after a series of completely negative results on the first few units manufactured.

Our records show that Serial No. 100 (the original prototype) was tested on July 1, 1977, while S/N 101, 102, and 103 were tested on October 6, 1977. After this no further tests were made. Since that date S/N 104, 105, 106, 107, and 111 were exported; S/N 108, 109, and 113 were sold domestically.

We do not consider it feasible nor truly necessary to recall the above-sold kits in view of the completely negative findings on the four kits properly tested. On a few occasions we have had kits returned to us for repairs not involving the detector cell. In the future when any of the nontested kits are returned, we will conduct containment tests on them.

To prevent future instances of such noncompliance, we are establishing a quality control system (by chart) so that each kit when manufactured or when prepared for shipment will be checked off against a list of required tests as stated in our letter of July 19, 1977 (not August 24, 1979, per your Appendix A). Further, we are now preparing a new external

Mr. H. E. Book

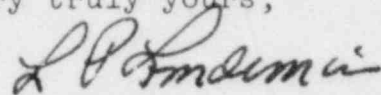
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label to update the existing label to the newer requirements of 10 CFR 32.29(b)(3).

With the exception of the label just mentioned, which will take a week or two for printing (and which was not cited for noncompliance), and in view of the corrective measures presented here, we regard that we have achieved full compliance as of the date of this letter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "L. P. Lindemir".