



DEPARTMENT OF THE ARMY
ALBUQUERQUE DISTRICT, CORPS OF ENGINEERS
P. O. BOX 1580
ALBUQUERQUE, NEW MEXICO 87103

REPLY TO
ATTENTION OF
SWACO-M

5 April 1982

Mr. Glen D. Brown
U.S. Nuclear Regulatory Commission
Region IV
611 Rylan Plaza Dr., Suite 1000
Arlington, TX 76012

Dear Mr. Brown:

Your letter, dated March 19, 1982, states that the Albuquerque District was found in violation of three provisions contained in the NRC by-product material License 30-17283-01, which is applicable to the Troxler Nuclear Density Testing Device, owned by this District. These violations have been acknowledged and actions have been taken to assure that the radiation safety program will be consistent with accepted practices.

The license to which these violations are applicable expired on 31 December 1981. Consequently, the Troxler Device is not in use and is being stored in a secure area. An application for a new license was forwarded to NRC through Corps of Engineers' channels on 26 March 1982. This new license, if approved, contains provisions which will change previously utilized procedures that were not proper to new procedures which are believed to be acceptable. Specific procedures which will be changed by both the proposed license and by new operating procedures which are relevant to the Notice of Violation are as follows:

a. Contrary to License Condition 16, leak tests were performed during the period 1 January 1979 to 24 February 1982, using methods other than the Troxler Kit, methods that lacked the sensitivity to detect .005 uCi -- As stated in the proposed license, leak testing will be conducted semi-annually using the instructions and/or kit provided by the U.S. Army Ionizing Radiation Dosimetry Center, Lexington, KY, with testing being performed by this agency or other authorized agency. This procedure will be initiated upon receipt of a license from NRC which approves this method.

b. Contrary to License Condition 16, portable instruments had not been calibrated since January 1979 -- The proposed license states that no detection instruments will be used. All radiation sources in

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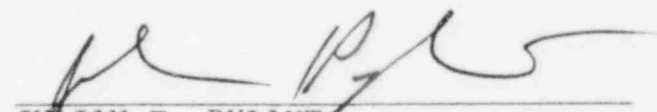
use are sealed by the manufacturer, and the use of separate detection instruments will not be required. Maintenance and service will be performed by the manufacturer or other authorized agency.

c. Contrary to 10CFR 20.401(a), records were not maintained showing the radiation exposures of all individuals for whom personnel monitoring was required for the year 1979 -- A letter was sent 18 March 1982 to the U.S. Army Ionizing Radiation Dosimetry Center, Lexington, KY, asking for copies of records which indicate the radiation exposure of personnel during 1979. A procedure has been established which will maintain accurate records of radiation exposure for applicable personnel.

The above-stated actions have been taken to correct the radiological safety program for compliance with accepted practices. These actions should help avoid further violations if the license application is approved. Compliance will be achieved at the time of license approval.

I certify that all information contained in this letter is true and correct to the best of my knowledge and belief.

5 Apr 82
Date

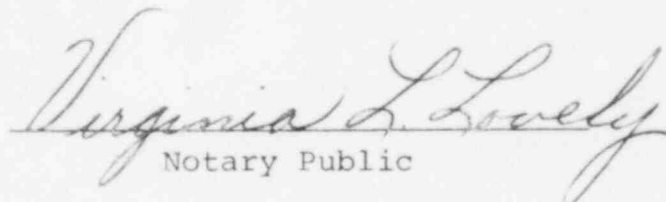


JULIAN E. PYLANT
Lieutenant Colonel, EN
District Engineer

State of New Mexico

County of Bernalillo . . . ss

The foregoing letter was acknowledged before me this 5th
day of April 1982.



Notary Public

My commission expires:

7-20-84