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Monday, February 7, 1994

Mr. John A. Grobe
Chief Nuclear Material Safety Section 2
U. S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

Dear Mr. Grobe:

Reference: License No. 24-21362-01
Docket No. 030-20567

Reply to a Notice of Violation

In your letter dated January 20, 1994, you identified two items of concern and one apparent violation of NRC requirements. These two items and apparent violation are repeated below followed by our response.

1. "Information recorded in the minutes of the Radiation Safety Committee regarding review of radiation exposures above the ALARA trigger levels do not provide adequate detailed information regarding root causes of the exposures. The NRC considers such information important in promoting improved performance of workers and reduction in the number and seriousness of future incidents. Also, evaluations done by the committee regarding incidents fail to indicate that the licensee has made a determination as to whether the licensee has complied with NRC reporting requirements".

Future reviews of radiation exposures above the ALARA trigger levels will provide detailed information regarding root causes of the exposures as may be determined by investigation. In case the root causes of an exposure cannot be determined, the committee minutes will include a statement to that effect. Similarly, whenever the RSO determines that an incident is not reportable to the NRC, his reports to the Committee will so state.

2. "Records of weekly contamination surveys and surveys performed by the inspectors during the inspection indicate chronic low level contamination and numerous instances where action levels were exceeded in the restricted areas in building 100. Chronic contamination is considered an indication of poor laboratory practices, or that improvement of equipment designed to prevent spread of contamination may be required".

A meeting with all radiation workers was held on 2/4/94. The following topics were covered. The January 20, 1994, NRC letter was discussed fully. The need to improve contamination control was emphasized. It was announced that the Health Physicist will study the work habits of production chemists to determine whether handling practices need to be modified. A plan was announced to either replace old fume hoods with ones up to modern standards, or to upgrade existing

fume hoods to such standards. It was announced that a significant improvement in contamination control has been observed which was attributed to a change in the cleaning schedule which provides for more cleanup time.

"Condition 23 of License No. 24-21362-01 requires that licensed material be processed and used in accordance with statements, representations and procedures contained in an application dated October 1, 1992.

"Item 4.2.1.5 of the section of that application entitled 'Permissible Levels of Surface Contamination' states in part that any surface which has readily removable contamination in excess of permissible levels shall be decontaminated until reduced below the applicable levels. Item 4.2.1.5, Sub item 4, states the permissible level of contamination on surfaces in unrestricted areas is 1100 dpm/100 cm² for tritium and 220 dpm/100 cm² for other beta emitting radionuclides.

"Contrary to the above, on November 14, 1993, during an NRC inspection, the loading dock of building 100, an unrestricted area, was found to have approximately 26,000 dpm/100 cm² tritium-3 removable contamination, a level in excess of 23 times the level allowed by license condition for unrestricted areas, and the area had not been decontaminated."

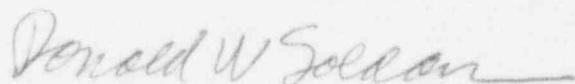
The loading dock of building 100 is used to transfer radioactive waste drums to building 200 for storage prior to disposal. We believe the contamination on the loading dock may have come from this operation. Standard Operating Procedure SOP-08, Radioactive Waste Program, states in part that "The drum is wiped-down and wipe-tested before being removed from the laboratory to the radioactive waste storage building." Although the drums were wipe-tested, we cannot be sure that the bottom of each drum was wipe-tested. If the bottom of a drum were contaminated, this could have caused the transfer of activity to the loading dock. Therefore, SOP-08 has been modified to read as follows: "The drum is wiped-down and wipe-tested, including the bottom of the drum, before being removed from the laboratory to the radioactive waste storage building." We believe this additional step will prevent the recurrence of a similar situation.

Subsequent to the inspection, the loading dock was decontaminated and wipe-tested. Removable contamination levels were well within permissible levels and have remained so to date.

Should you need additional information, contact me by FAX or telephone at the above numbers.

Sincerely,

AMERICAN RADIOLABELED CHEMICALS, INC.



Donald W. Soldan
Radiation Safety Officer

Enclosures

cc: RSC members