


U. S. Nuclear Regulatory Commission  
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Washington, DC 20555

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10 February 1994

Reply to a Notice of Violation

 **Amersham**  
USA

Docket number: 030-29300; 030-32596; 040-08917

Amersham Corporation responds to the Notice of Violation concerning docket number 030-29300 as given below. The responses are given in the same order as requested in the Notice of Violation.

(1) Amersham exceeded its possession limits for sealed sources on three occasions due to shipments of bulk material not arriving on the preplanned schedule. The iridium does not always arrive in accordance with the preplanned schedule due to several reasons that are difficult to control:

-The reactor cycles of the suppliers that provide us with the bulk iridium, are constantly changing and a shipment is often shipped earlier or later than originally planned. This then overlaps with shipments coming in from other suppliers.

-The length of time that each shipment takes to be cleared from customs (for the import shipments) is also variable. This makes the arrival date of all of the import shipments difficult to control, again causing arrival of separate shipments to overlap.

(2) In each case that we determined we had exceeded the possession limits for sealed sources, we immediately took the action to convert the sealed (special form sources) into unsealed Ir-192. This brought our possession limits for both sealed and unsealed to be within our licensed possession limits.

We have also performed a more accurate assessment of existing quantities of sealed sources and better determined our permanent

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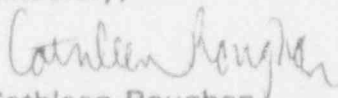
inventory. This allows for better control of inventory, as we know the maximum quantity that can be initially ordered and scheduled to arrive without exceeding our possession limits.

These actions have brought us into control with keeping quantities under the possession limits under current conditions. However due to an anticipated increase in production and an increase in the spent sealed source inventory due to the low level waste issue we need to increase our possession limits for long term compliance.

- (3) To prevent any further violations, we have requested an amendment to our radioactive materials license to increase our possession limits for both sealed and unsealed sources of Ir-192. This amendment request was sent to Region I on 25 January 1994. A copy of this letter is enclosed.
- (4) We have been in compliance since September 1993, and we will be able to assure continued compliance upon receipt of the license amendment for an increase in possession limits.

I trust this contains the information necessary to close out this notice of violation. Please contact me if you require any additional information.

Sincerely,

  
Cathleen Roughan  
Regulatory Affairs Manager

cc: Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
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