

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

JAY S. HAMMOND, GOVERNOR

P. O. Box 3150

SOLDOTNA 99669

September 28, 1982

United States
Nuclear Regulatory Commission
Region V
1450 Maria Lane Suite 260
Walnut Creek, CA 94596

Attention: Mr. George S. Spencer

As part of a routine safety inspection concerning License No. 50-18324-01 conducted by Mr. M. Grayson and Mr. R. D. Thomas on July 23 1982, a notice of violation was issued. This is in response to that notice dated 17 August 1982 and received in Soldotna on 23 August 1982. The notice calls for a written statement or explanation in reply covering:

- (1) corrective steps which have been taken and the results achieved,
- (2) corrective steps which will be taken to avoid further items of noncompliance,
- (3) the date by which compliance will be achieved.

Violation A

To conduct studies on moose digestion rates, the isotopes hydrogen-3, chromium-51 EDTA and ruthenium-103 were required. The amounts of each to be used called for an amended license to purchase and possess only the ruthenium-103 as exempt quantities of the remaining isotopes were to be purchased. Three trials on three dates were conducted with each trial using the same quantity of isotope. Our shipping receipts indicate purchase of greater than exempt quantities on only one occasion i.e., the initial run. However, we cannot reconcile our isotope use on this one run with the shipping receipts i.e., we used exempt quantities on each and every run.

Nevertheless, our experiments are presently over and we plan no further work with these isotopes. Consequently, we will not be in noncompliance on any future date, and compliance was achieved in 1980.

Violation B

Weekly surveys of isotope use areas were performed however, the results were always negative i.e., no detectable contamination. At the time of inspection,

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the records of such a program were not available. That is, the paper trail or documentation of such a program was found to be insufficient. I am in the process of amending my procurement license to reflect our past experience and thus institute new procedures. However, until the license is amended, I have instituted a record keeping process which complies with my pre-existing license effective 24 July 1982.

Violation C

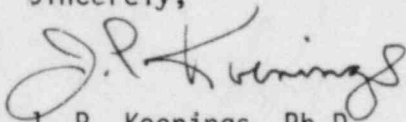
We have instituted a record keeping system effective 24 July 1982 that will allow a mass balance to be calculated on isotope purchase and disposal. Prior to this, records were kept by date of purchase of isotopes (particularly carbon -14). However, as all isotope purchased was disposed of in like manner our disposal records are readily reconstructed from our data files. We have now completed (2 August 1982) our purchase/use disposal records from 1979 to present. Compliance will be maintained by our newer more direct record keeping procedures.

Violation D

We have the data desired and can/will submit it if it will be of use.

Finally, I intend, as stated, to amend my license to reflect the growing and changing nature of my research program. As the amended license will more closely reflect present isotope use procedures, I foresee no difficulty in being in complete compliance with NRC regulations.

Sincerely,



J. P. Koenings, Ph.D.
Principal Limnologist
FRED Division

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