

July 30, 1990

Bruce S. Mallett, Ph.D., Chief
Nuclear Materials Safety Branch
U.S. Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

RE: License No.: 24-04206-01
Docket No.: 030-00001

Dear Dr. Mallett:

This is in response to the violation cited in your inspection report of June 7, 1990. Your office had granted us an extension of 30 days for our response.

Our radiation protection program requires us to provide retraining to radiation workers at least once every three years, and an annual test to determine their understanding of how radiation protection relates to their jobs.

In your notice of violation, you stated that Mallinckrodt Medical, Inc. failed to provide annual testing of radiation workers in 1989. However, please note that we provided extensive retraining to radiation workers in 1989. On the other hand, it was in 1988 that we did not conduct the annual testing of radiation workers. We called your office to clarify this point to your staff after we received the inspection report.

We conducted comprehensive retraining sessions in 1989 for radiation workers with special emphasis on the radiation protection principles and practices as it relates to their respective jobs. Prior to this, annual retraining sessions were held in 1987.

The Health Physics Supervisor of our facility resigned in August, 1987, and the new Supervisor joined Mallinckrodt Medical, Inc. in May, 1988. Based upon the workload, a list of tasks was developed and highest priorities were assigned to reaccreditation of our external dosimetry (TLD) program under NVLAP, development and implementation of new software and procedures for the in-house dosimetry system, initial

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radiation protection training for new employees, and upgrading the instrumentation. Because of these urgent requirements at the plant, we were not able to conduct the annual testing of radiation workers in 1988. However, having recognized this, we conducted comprehensive retraining sessions in radiation protection in 1989, although we were not scheduled to hold these sessions until 1990.

As an additional corrective action, we have developed a Standard Testing Method (equivalent of an SOP) in the Health Physics Department to cover radiation protection training program of our license. The procedure includes: Scheduling and frequency of initial training (indoctrination and formal training), re-training (annual testing and training sessions every three years), and person(s) responsible for conducting this training.

If you have any questions, or need any further information, please let us know.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "A. E. Hall", followed by the word "for" written in a cursive style.

Albert E. Hall
Plant Manager