



# Bristol-Myers Squibb Company

Pharmaceutical Group Technical Operations

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Worldwide Quality Control  
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September 10, 1990

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Re: Reply to a Notice of Violation

To All Concerned:

Enclosed are responses to the two violations noted during the Commission's routine inspections performed on January 23 and 24 and May 16, 1990. The inspection concerned the licensed activities of E. R. Squibb & Sons, Inc. radioactive materials license #29-00139-02.

### Violation A.

10 CFR 20.203(c)(2) requires that each entrance or access point to a high radiation area be equipped with a control device which shall cause the level of radiation to be reduced below that at which an individual might receive a dose of 100 millirems in 1 hour upon entry into the area or equipped with a control device which shall energize a conspicuous visible or audible alarm signal in such a manner that the individual entering the high radiation area and the licensee or a supervisor of the activity are made aware of the entry. In addition the area is to be maintained locked except during periods when access to the area is required, with positive control over each individual entry.

Contrary to the above, as January 23, 1990, a high radiation area existed on the second floor of the maintenance building and access to this area was not controlled by any of the described methods.

**Response:** The following measures have been taken to correct and prevent a recurrence of Violation A:

- The survey frequency of the second floor machine room in Building 124 has been increased from once a week to daily.
- A secured chain link fence was installed around the group of filtration housings to control access to this area should exposure rates approach or exceed 0.400 mR/hr at these housings.

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- A visible warning light was installed at the fence line to alert personnel of the possible presences of a high radiation area.
- The area was posted as a high radiation area.

Temporary measures necessary to comply with 10 CFR 20.203(c)(2) were completed on January 24, 1990. Full compliance was achieved on March 16, 1990.

**Violation B.**

License Condition 24 of License No. 29-00139-02 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in April 3, 1985.

Procedure III-4 "Radioactive Waste Disposal" contained in letter April 3, 1985, states that the decay barn will be closed and locked when no one is in attendance.

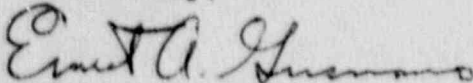
Contrary to the above, On January 23, 1990, the decay barn was found to be opened and unlocked when no one was in attendance.

**Response:** The following actions were taken to correct the problem and to prevent a recurrence:

- All responsible personnel have been reinstructed to secure this area when exiting.
- Daily security checks of this area have been incorporated in the routine survey program.

Should any additional information pertaining to the above response be required, please contact me.

Sincerely,



Ernest A. Gusmano

EAG/

cc: Mr. D. K. Balkunow, RSO  
Mr. R. Endries  
Mr. J. Gresh  
Radiation Safety Committee

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