

March 25, 1994

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

Docket Nos. 030-03796 and 040-00791

Subject: **Reply to a Notice of Violation**

Dear Sir or Madam:

On January 26, 1994, an inspection of our Source Material license conditions (SMB-151) resulted in a Notice of Violation for failing to conduct removable contamination surveys during 1993 where welding, cutting, shearing, and punching of source material took place. The violation was noted at our Pratt & Whitney, Middletown, Connecticut location.

We concur with your finding and offer the following reason to explain why the violation occurred. Our current license requires us to perform removable contamination wipe surveys on a periodic basis. Periodic leaves room for interpretation and in this case too much time passed between sampling.

As a result of this violation we have taken the following corrective actions to achieve compliance:

- Communicate the Notice of Violation to the safety engineer responsible for the radiation safety program at the Middletown facility.
- Conduct removable contamination wipe sampling by April 1, 1994 where welding, cutting, shearing and punching of source material takes place.

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In order to ensure that further violation will not occur, the following actions will be achieved:

- Require removable contamination surveys to be performed annually.
- Conduct regular audits of the radiation safety program
- Modify internal procedures to reflect the changes in survey frequency and auditing.

Finally, we expect to achieve full compliance with our license conditions with the completion of the removable wipe contamination survey which will be completed by April 1, 1994.

Please do not hesitate to contact the undersigned at (203) 565-7526 if you have any further questions on this matter.

Sincerely,



Stephen M. Juers, CIH
Radiation Safety Officer

SMJ/smj

cc: U. S. Nuclear Regulatory Commission, Region 1