



BUDNEY COMPANY, INC.

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January 27, 1994

Regional Administrator
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

RE: Reply to Notice of Violation
Routine Inspection No. 040-08974/93-001
Materials License No. STB-1530
Docket No. 040-08974

Gentlemen:

This is in response to the Notice of Violation dated January 12, 1994, requesting a written statement or explanation. The numbered responses below refer to the numbered items in your above-referenced letter.

1. The reason for the violation was an oversight by the radiation safety officer. At the time of our initial license application we were asked about dosimetry and we decided to use direct-reading pocket dosimeters. Prior to actually purchasing this dosimetry we were made aware of the requirements of 10CFR20.202 stating that dosimetry was not required if our personnel were likely to receive less than 25% of the applicable limits, which is the case at our facility. Our mistake, however, was not in realizing that this dosimetry requirement was actually incorporated into our license in the letter dated December 21, 1988, and in order for us to not use of this dosimetry we needed to apply for an amendment to our license.

In order to correct this violation, direct-reading pocket dosimeters were obtained and immediately issued to all personnel who machine the Mg-Th parts. These personnel were also trained in the proper use of this dosimetry. This was accomplished on January 26, 1994 to return our program to full compliance.

In our license renewal request, dated January 27, 1994, it will be requested that the personnel dosimetry requirement be removed from Budney Company's license requirements. Under the provisions of 10CFR20.1502, no individual who enters a restricted area is likely to receive in 1 year from sources external to the body, a dose in excess of 10 percent of the limits stated in 10CFR20.1201(a). The thoriated castings would normally fall under the provisions of 10CFR40.13(c)(4), except for the machine work. Radiation surveys conducted over the last five years confirm that exposure levels are less than 10% of the limit specified in 10CFR20.1201(a).

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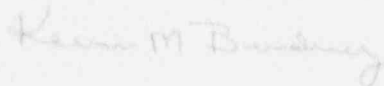
2. The reason for the violation was an oversight by the Radiation Safety Officer. The survey instrument was removed from the personnel monitoring station by the RSO to perform a survey. The RSO noted that the instrument needed calibration and failed to return the instrument to the personnel monitoring station. The fact that personnel who were supposed to be performing routine personnel monitoring did not notice the instrument's absence also is of concern to us.

To correct this violation the instrument was immediately sent out for calibration and returned to the personnel monitoring station. All personnel who machine Mg-Th parts were informed of this violation and trained on the requirements for properly monitoring themselves after working with Mg-Th. Full compliance with this requirement was achieved on January 26, 1994.

In our license renewal request, dated January 27, 1994, a modification to this procedure will be requested.

It is our belief that we are now in full compliance with the requirements of our radioactive materials license and will take all necessary steps to ensure that these requirements are met in the future. If you require any additional information or have any questions please do not hesitate to call.

Sincerely,



Kevin Budney
Radiation Safety Officer