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Dennison
Technical Papers

September 16, 1982

Mr. D. J. Sreniawski, Chief
Materials Radiation Protection
United States Nuclear
Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Reference: Your letter of August 18, 1982

Subject: Notice of Violation
License No. 21-18534-01 and General License

Dear Mr. Sreniawski:

Since the routine safety inspection conducted by Messrs. W. J. Slowinski and T. J. Ploski on August 10th, 1982, we have taken measures to achieve compliance with the NRC regulations concerning radioactive devices used by us in gauging applications.

I. With regard to Item 1 of the notice of violation:

A. On August 19th, 1982, AccuRay Corporation tested our sealed source containing cesium-137 for contamination or leakage. The test results were negative; an informational copy is enclosed.

B. Mr. Ronald Koglin has been appointed Radiation Safety Officer. He will have administrative control over the use of our radioactive gauging devices. The testing and record keeping programs required by our NRC license will be maintained by Mr. Koglin. Arrangements have been made with AccuRay Corporation to test this unit at 6-month intervals.

C. The testing of the unit is complete and an on-going test program has been established. We expect administrative compliance to be accomplished within sixty days.

II. With regard to Item 2 of the notice of violation:

A. The krypton-85 sealed source which was shipped to Foxboro Manufacturing, Foxboro, Mass., was received for disposal. Corrective action regarding the shipping papers and package labeling for this device does not seem appropriate.

B. Mr. Ronald Koglin has been appointed Radiation Safety Officer. As such, he will have administrative control over the shipment and receipt of our radioactive gauging devices. Compliance with all NRC and DOT shipping requirements of our license will be maintained through his offices.

C. We are not anticipating any shipments of radioactive material at the present time. Administrative compliance is expected to be complete within sixty days.

In the future, we will use the appropriate governmental regulations and assistance from the Nuclear Regulatory Commission, rather than advice from vendors, as our operating guidelines concerning radioactive devices.

If you should have any questions regarding the above information, please do not hesitate to contact me at your earliest convenience.

Very truly yours,

A. H. Hupp
Senior Vice President
Technical Operations

AHH:m
Encls.

AccuRay CORPORATION
650 ACKERMAN ROAD POST OFFICE BOX 02248 COLUMBUS, OHIO 43202

RADIOLOGICAL INSPECTION REPORT

This is a report of the inspection made of your radioisotope device and should be retained in a permanent file along with all other records of licensing or registration, receipt, installation, servicing and transfer of your radioactive material. Your regulatory authority may wish to review this information. Check your license or local regulations carefully.

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DUNN PAPER CO
218 RIVERVIEW ST
PORT HURON MI 48060

ATTN. RON KOGLIN
PLANT SITE: PORT HURON MI

REPORT DATE: 820830
LAB TEST DATE: 820824
PERFORMED BY: K.J. HARRIS

Device Model	Device Serial Number	Source Serial Number	Isotope	Quan. (mCi)	Field Inspection Result				Lab Test Result
					Source	Shutter	Performed By	Date	
NR/LS-101	872307	CS-2150NR	CS137	25	NEG	ON	W. GERBER	820819	NEG

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SEP 7 1982
TECH. OPERS.

NOTES

1. NanoCurie (nCi) = .001 microCurie (μCi) = 10^{-6} milliCurie (mCi).
2. The entry "Neg" in the source column means less than 0.5 nanoCurie of removable contamination.
3. Any amount of detected activity greater than 0.5 nanoCurie is expressed in nanoCuries.
4. The entry "OK" in the shutter column means the shutter mechanism and indicators, if any, are operating properly, labeling is in proper condition, and the external radiation levels are consistent with those specified for the device. Discrepancies are detailed in appropriate notes.
5. The presence of 5 nanoCuries (.005 μCi) or more of removable contamination is considered evidence that the source is leaking. Refer to your regulatory requirements regarding leakage or malfunction.

Eugene Stephens
for DONALD C. STEPHENS
RADIOLOGICAL OPERATIONS MANAGER

BF-898 (4-82)

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