



UNITED STATES DEPARTMENT OF COMMERCE
National Bureau of Standards
Washington, D.C. 20234

September 17, 1982

J. S. Nuclear Regulatory Commission
Region I
Attn: Mr. Thomas T. Martin
Director, Division of Engineering
and Technical Programs
631 Park Avenue
King of Prussia, PA 19406

Docket Nos. 70-398
30-3918

Subject: Inspection Nos. 70-398/82-03 and 30-3918/82-03

Gentlemen:

In response to your September 8, 1982, report on the inspection of licensed activities, we submit the following:

- A. We will require that an authorized representative of the Department of Energy (DoE) certify that for Type B shipments of DoE material and for DoE purposes:
1. The DoT specification container or the NRC approved container, as the case may be, was designed and constructed to the indicated specifications; or
 2. The DoE accepts responsibility for the radioactive material at NBS and acts as the shipper of the material from NBS to the destination, thus assuring shipment compliance and consignee receipt authorization.

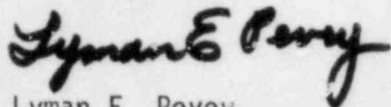
This item refers to a shipment made in a container designed and constructed for use by DoE. Weighing several tons and fixed to a dedicated flat-bed trailer, the container has been approved by the NRC since the shipment was made. As the radioactive material involved was sent to NBS for calibration before continuing to the ultimate recipient, we believed that DoE was acting as shipper throughout the transaction. Thus, our failure was in not having a DoE representative properly execute the shipper's certification documentation.

- B. Instructions have been issued governing Specification 7A container reuse. These have been implemented for Specification 7A containers for which original test and certification documentation is not available.

C. Instructions have been issued governing labelling and posting of containers for the californium-252 sources. These have been implemented.

Should you have further questions on these items, please contact either Mr. Hobbs or Mr. Slaback at (FTS)921-2247.

Sincerely,



Lyman E. Pevey
Chief, Occupational Health
and Safety Division