



MONTANA BUREAU OF MINES AND GEOLOGY  
MONTANA COLLEGE OF MINERAL SCIENCE AND TECHNOLOGY  
BUTTE, MONTANA 59701  
406/496-4180

Office of the Director

November 27, 1990

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

REPLY TO A NOTICE OF VIOLATION  
Docket No. 030-09501/90-01  
License No. 25-15640-01

Sirs/Madams:

The routine NRC inspection of our facilities and records was informative to our staff and has resulted in several changes in our operation. The one violation in the Notice, according to 10 CFR 20.401(a), was that we did not maintain proper exposure records between October 1, 1987 and July 9, 1990. The specific infraction was that the date of birth and social security number for one individual was missing on the exposure reports. The reason for this violation was the omission of information due to a change in personnel responsible for the records. Corrective action was taken immediately following the onsite inspection so that the dosimetry service company (TMA Eberline) now has complete information for all individuals in our dosimetry program. The information was additionally hand-written into the most current exposure record. We also have established a new policy for individuals to obtain personnel dosimetry services such that they are required to submit all pertinent information in the form of an application prior to receiving a TLD badge or other monitoring device. Full compliance to the requirement was achieved in the last week of October, 1990, during which all relevant information was gathered from individuals in our program and included in the records for personnel dosimetry.

One of the major concerns mentioned in the letter from A. Bill Beach dated November 2, 1990, was that the licensed entity for our program should be redesignated from the Bureau of Mines and Geology (MBMG) to Montana College of Mineral Science and Technology ("Foundation" was inadvertently added and should be disregarded) commonly known as Montana Tech. Also mentioned were the subjects of adequate staffing and financing for a radiation safety program. The President of Montana Tech, Lindsay D. Norman, outlined in a letter dated October 26, 1990 to Jack Whitten, Arlington NRC (Region IV) a commitment to maintain a radiation safety program through a campus Radiation Safety Committee. A copy of this letter and supporting particulars are enclosed.

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The NRC inspector also identified several sealed sources that have been in storage without definite plans for future use. We are considering all options for eventual transfer of some to other agencies, but we will retain those sources that we feel may be eventually brought out of storage as our program grows. Moreover, we are requesting in our license amendment permission to use one of the Cs-137 (125 mCi) currently in storage as a source for instrument calibration. If permission is granted, we will bring the source out of storage and have it calibrated according to NIST-traceable specifications.

If you have any specific questions concerning our overall radiation safety program or Montana Tech's involvement with radioisotopes, please contact our Radiation Safety Officer, Scott S. Hughes, at 406-496-4279.

Sincerely,



Edward T. Ruppel  
Director and State Geologist

ETR/blm

Enclosures

cc: NRC Regional Administrator, Region IV