

HOFFMANN-LA ROCHE INC.

NUTLEY • NEW JERSEY • 07110

September 17, 1982

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

Dear Mr. Martin:

Reference: Docket Numbers 30-05210, 30-08514, 30-08515
License Numbers 29-00018-02, 29-00018-05E, 29-00018-06G

This letter is in response to your letter of August 23, 1982, summarizing the results of a routine safety inspection conducted at our Nutley and Belleville, NJ facilities on July 14-15, 1982. Your Appendix A (Notice of Violation) lists three violations labeled A, B, and C and requires that Hoffmann-La Roche Inc. give written statements or explanations including (1) the corrective steps which have been taken and the results achieved, (2) corrective steps which will be taken to avoid further violations, and (3) the date when full compliance will be achieved.

We have taken steps which we believe have corrected all of the violations listed in your letter, and as such, are now in full compliance. The corrective steps which have been taken to achieve compliance are listed below:

- A. Survey requirements for radioactive material in the normal trash.
(10 CFR 20.201(b) and 10 CFR 20.301)
1. A memo to the Senior Staff at the affected building has been sent, reinforcing the proper disposal of contaminated material.
 2. Radiation Safety staff personnel will continue checking trash receptacles during routine survey inspections.
 3. Research personnel will conduct and document weekly self-inspections of approximately 25 trash receptacles until self-compliance is attained. Thereafter, self-inspections will continue with whatever frequency is necessary to maintain compliance. Warning memos for radiation safety violations will be directed to the senior investigator with a copy held in the personnel file.

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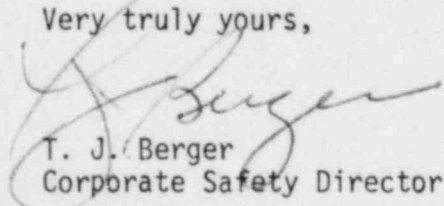
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- B. Food and beverages in radioisotope refrigerators (license condition 20, letter of July 12, 1979, item 12, Appendix II).
1. A memo to Senior Staff at the affected building has been sent, reinforcing Industrial Hygiene Standard No. 1, which prohibits the storage and consumption of food and beverages in labs.
 2. The placement of signs "Caution Chemical Storage Only - No Food Permitted" on all refrigerators/freezers used for chemical storage has been accomplished.
 3. Refrigerators have been provided for the storage of food only.
 4. Research personnel will conduct and document weekly self-inspections of approximately 25 chemical storage refrigerators/freezers until self-compliance is attained. Thereafter, self-inspections will continue with whatever frequency is found necessary for self-compliance. If food or beverages are found they will be rendered inedible and disposed into the radioactive waste receptacle. Warning memos for any radiation safety violation will be directed to the senior investigator with a copy held in the personnel file.
 5. Radiation Safety personnel will continue random checks of refrigerators/freezers during routine monitoring visits.
- C. Posting of Form NRC-3 "Notice to Employees" (10 CFR 19.11(c)).
1. Current copies of Form NRC-3 have been posted on at least one bulletin board on each floor of the Roche Institute of Molecular Biology. Furthermore, Radiation Safety staff will make checks of all required postings during their routine radiation surveys, and will replace any missing or defaced documents.

Please call me at (201) 235-3258 if you need further information.

Very truly yours,



T. J. Berger
Corporate Safety Director

TJB:lc