



Robert F. Flacke
Commissioner

July 9, 1982

Mr. Ronald C. Haynes
Regional Administrator
USNRC - Region 1
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Haynes:

As noted in Commissioner Flacke's May 11 letter to you, I have been requested to reply to the NRC comments of the technical aspects of the radiation control program. These comments are as follows:

I. Personnel

It was agreed that the Associate Air Pollution Control Engineer in the Toxics and Radiation Section should attend the next scheduled inspection procedures course. He had applied for this course when it was last presented and had been turned down because the course had been filled. He has since transferred from the Toxics and Radiation Section. If a replacement is obtained for the radiation program, training in NRC "core" courses will be given high priority.

II. Compliance

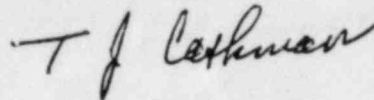
- A. The two priority II permittees with incinerators will be inspected prior to August 31. Follow-up will be made on the status of permits for Radium Chemical Company.
- B. The remaining staff member will leave in September. A field evaluation will be performed this year if a replacement is obtained.
- C. It is agreed that inspection reports should include comments on whether effluent samples are collected in a representative fashion and that the tests on stack filters be documented in the reports. It was noted at the meeting with Mr. Lubenau that a DOP test had been made at the facility in question.

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- D. It is agreed that added documentation in the inspection report is desirable and should include annual average concentrations of radioactivity discharged in addition to the statement that the permit limits were met.

It was encouraging to again have the NRC find that the Department's program for regulation of agreement material is adequate to protect the public health and safety. The thoroughness of the NRC review and the constructive comments are appreciated.

Sincerely,



Thomas J. Cashman
Chief
Toxics and Radiation Section
Bureau of Source Control
Division of Air