

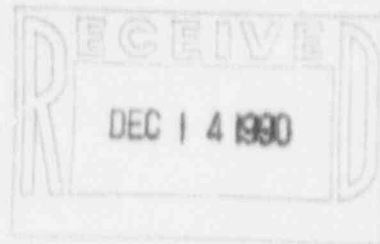
STANDARD TESTING AND ENGINEERING COMPANY

CORPORATE OFFICE and CENTRAL LABORATORY
3400 N. LINCOLN, OKLAHOMA CITY, OK 73105 (405) 528-0541

Area Offices

9200 KING ARTHUR DRIVE	DALLAS, TX 75386	(214) 631-4372
902 TRAILS WEST LOOP	ENID, OK 73703	(405) 237-3130
660 DISTRIBUTORS ROW, SUITE C	HARAHAN, LA 70123	(504) 734-8378
900 S.E. SECOND	LAWTON, OK 73501	(405) 353-0872
4040 E. McDOWELL, SUITE 106	PHOENIX, AZ 85008	(602) 273-6934

December 12, 1990



Ms. Linda L. Kasner
NUCLEAR REGULATORY COMMISSION
Division of Radiation Safety and Safeguards
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Dear Ms. Kasner:

Please find enclosed a copy of our latest submittal letter, dated August 7, 1990. If you have any further questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas J. Kelly".

Thomas J. Kelly
President

9101070022 901231
REQ4 LIC30
35-17054-01 PDR

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August 7, 1990

NUCLEAR REGULATORY COMMISSION
Mr. A. Bill Beach, Director
Division of Radiation Safety and Safeguards
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

RE: License: 35-17054-01
Docket: 30-12123/90-01
EA. No.: 90-107

Dear Mr. Beach:

A) TRANSFER OF LICENSED MATERIAL TO AN UNAUTHORIZED RECIPIENT

- 1) REASON FOR VIOLATION: The Varian GC was transferred from storage by our company president to St. Gregory's Jr. College for use in the Chemistry Lab. He did not see the small label on the GC detector. Also, the GC was not on the physical inventory of by-product materials. The unit was disposed of by the College after it was determined to be non-repairable.
- 2) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED: All sales or transfer of services will be made by the Radiation Safety Officer only. All by-product materials are on inventory.
- 3) CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS: Semi-annual meetings are scheduled with the Radiation Safety Officer and company President to review compliance with all NRC regulations.
- 4) COMPLIANCE ACHIEVED: Full compliance June 1, 1990.

B) FAILURE TO CONDUCT PHYSICAL INVENTORIES OF ALL BY-PRODUCT MATERIALS

- 1) REASON FOR VIOLATION: Radiation Safety Officer had not placed the GC detector on inventory, due to the type of equipment and location of equipment (storage).
- 2) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED: All by-product materials are on inventory.

9008130799 LPP.

- 3) CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS: All purchases and/or sales of by-product materials will be authorized by the Radiation Safety Officer. All by-product materials will be physically inventoried four times a year.
 - 4) COMPLIANCE ACHIEVED: Full compliance June 1, 1990.
- C) FAILURE TO CONDUCT AN EVALUATION NECESSARY TO ENSURE THAT OCCUPATIONAL EXPOSURE OF INDIVIDUALS HAD REMAINED WITHIN THE LIMITS SPECIFIED
- 1) REASON FOR VIOLATION: Radiation Safety Officer was not aware of the procedure for evaluating lost or damaged film badges.
 - 2) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED: Evaluation for the last 3 years has been compiled and copies are attached.
 - 3) CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS: Evaluation will be made monthly.
 - 4) COMPLIANCE ACHIEVED: Full compliance June 1, 1990.
- D) THE USE OF STORAGE AREAS OTHER THAN THE FACILITIES IDENTIFIED IN THE LICENSE
- 1) REASON FOR VIOLATION: Field personnel on assignment distant from the central lab used temporary overnight storage for better efficiency.
 - 2) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED: All sources are now stored in designated locations, as identified in the license.
 - 3) CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS: When a storage location other than designated locations are needed, a change in designated storage will be requested.
 - 4) COMPLIANCE ACHIEVED: Full compliance June 1, 1990.
- E) FAILURE TO USE THE APPROPRIATE DOT TYPE A CONTAINERS WHEN TRANSPORTING NUCLEAR GAUGES.
- 1) REASON FOR VIOLATION: Gauges were transported in truck utility boxes for ease of operation, security of gauges, and better protection from damage than approved containers.
 - 2) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED: We have purchased and are using Department Of Transportation approved boxes for all gauges.

- 3) CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS: Vehicles and gauges are inspected periodically by the Radiation Safety Officer. We are researching how to get a truck utility box approved as Department of Transportation Type A containers.
- 4) COMPLIANCE ACHIEVED: Full compliance June 1, 1990.

F) PROVIDING ACCURATE INFORMATION

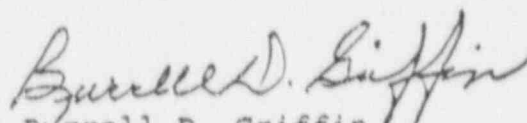
- 1) REASON FOR VIOLATION: Information furnished was correct to the best of the Radiation Safety Officer's knowledge at the time.
- 2) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED: Our accountability Program and Radiation Safety Officer Authorizations will insure proper data and information.
- 3) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED: Radiation Safety Officer will insure proper data and information.
- 4) COMPLIANCE ACHIEVED: Full compliance June 1, 1990.

We appreciate the professionalism shown in this investigation, and we have taken appropriate steps to correct all cited violations. Management and Radiation Safety Officer will review our program activities on a regular scheduled basis to insure full compliance with our license.

Sincerely,

STANDARD TESTING & ENGINEERING CO.

Thomas J. Kelly
President


Burrell D. Griffin
Radiation Safety Officer

1990

NAME	MONTH	ESTIMATED DOSE
COUTY	MARCH	TERMINATED MARCH 0

1989

NAME .	MONTH		ESTIMATED DOSE
BECKHAM	JUNE	WET ?	0
BECKHAM	JULY	WET ?	0
GRAY	AUG	WET ?	0
LINTHICUM	SEPT	WET ?	0

1988

NAME	MONTH		ESTIMATED DOSE
GOZA	JULY	MISSING	0
HORSEMAN	JULY	OLD BADGE ?	0
HUMPHREYS	JULY	OLD BADGE ?	0
RIGGS	AUG	OLD BADGE ?	0