

## RTI Inc.

108 LAKE DENMARK ROAD, ROCKAWAY, NJ 07866  
(201) 625-8400 • FAX (201) 625-7820

June 5, 1990

FEDERAL EXPRESS

Mr. Thomas T. Martin  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Malcolm R. Knapp, Director  
Division of Radiation Safety and  
Safeguards

John R. White, Chief  
Nuclear Materials Safety  
Section C  
Division of Radiation Safety and  
Safeguards  
U.S. Nuclear Regulatory  
Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Gentlemen:

The undersigned received by telecopier on May 31, 1990, a letter signed by Mr. Knapp with enclosures of synopsis of two OI investigations relating to an inspection of RTI's Rockaway facility on March 23, 1989 and an Enforcement Conference on April 26, 1989. In that letter, a second Enforcement Conference was scheduled for June 14, 1990 at 10:00 a.m. in King of Prussia, Pennsylvania. As stated in the letter, this was also discussed in a telephone conversation between myself and Mr. John R. White.

Upon reviewing Mr. Knapp's letter of May 31, 1990, and the two synopses, RTI requests that the Enforcement Conference be rescheduled, in order to permit us to review the materials referenced in the letter from Mr. Knapp. It should be noted that enclosures 1A and 1B of that letter are synopses of two OI reports; we request that we be provided with the complete OI reports so that we may be fully prepared for the Enforcement Conference. Some of the information contained in the synopses are necessarily incomplete and we feel that access to the complete OI reports is necessary as a matter of fairness, prior notice, and to provide us the opportunity to prepare for this transcribed Conference, as suggested in Mr. Knapp's letter of May 31, 1990.

As you are aware, one of the synopses makes conclusions regarding an "admission by operator No. 1" in that "he intentionally provided to NRC false information." Synopsis 1A, page 4. In order that the Company may consider appropriate

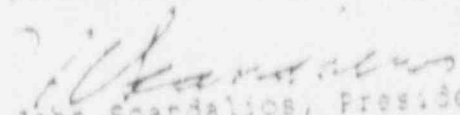
JUN 06 '90 09:12 RADIATION TECH

June 5, 1990  
Page 2

personnel action as promptly as possible with regard to this conclusion, and for the Company to evaluate fully this matter, it is also requested that the NRC staff provide to the Company a copy of all interviews which support both OI summaries, and the OI reports. The Company is prepared to promptly review these materials and requests that NRC provide such materials on an expedited basis. Upon review of these materials, we would then be in a position to move forward to expeditiously reschedule the Enforcement Conference once we have the information which we feel is necessary as described above. We may also want to take an additional few days to interview operators A, B, and C and/or the former employees referenced in the reports. We will be happy to cooperate to reschedule the Enforcement Conference and expedite our review of these materials so as to prevent any unnecessary delay.

Your prompt reply would be very much appreciated.

Sincerely,

  
John Scandalios, President

# CONVERSATION RECORD

TIME 9:45am

DATE 6/7/90

TYPE

VISIT

CONFERENCE

TELEPHONE

INCOMING

OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

John Scandalous

ORGANIZATION (Office, Dept., Bureau, etc.)

RTI

TELEPHONE NO.

ROUTING

NAME/SYMBOL INT

T Martin

Knapp

Cooper

Jayner

Miller

SUBJECT

Request for QI Report / Postponement of Enforcement Conference

SUMMARY

I informed Scandalous that we received his US letter requesting the subject report and recognize that this, of necessity, would delay the scheduled enforcement conference. I prepared a new target date two weeks after receipt of the report by RTI; Scandalous would not commit to this until he had a chance to see the report and estimate the review task. I stated that the release of the QI report would result in its being placed in the Public Document Room; Scandalous acknowledged this. He asked why the State of New Jersey received copies of, for example, the enforcement conference letter. I replied that NRC policy is to keep state informed.

ACTION REQUIRED

Obtain and transmit redacted QI report

NAME OF PERSON DOCUMENTING CONVERSATION

Lee H. Battenhouse

SIGNATURE

*Lee H. Battenhouse*

DATE

6/8/90

ACTION TAKEN

SIGNATURE

TITLE

DATE

50271-101

D. S. G. P. O. 1983-281-526/8346

CONVERSATION RECORD

OPTIONAL FORM 271 (12-76)  
DEPARTMENT OF DEFENSE

*B/Sy*

# RTI Inc.

108 LAKE DENMARK ROAD, ROCKAWAY, NJ 07866  
(201) 625-8400 • FAX (201) 625-7820

June 21, 1990

Mr. John Schlecht, Plant Manager  
Process Technology of North Jersey  
108 Lake Denmark Road  
Rockaway, N.J. 07866

Dear John:

On June 20, 1990 a Radiation Safety Audit and inspection was performed at the Rockaway facility utilizing the Radiation Safety Checklist (attached).

A compliance rating of 95% documents maintenance of the Radiation Safety Program. A rating above 90% indicates an acceptable situation but we should not forget that our goal is 100% compliance, improvement is expected.

Employees interviewed were Mike Ayers, Andy Friedrich, Austin Beetle, and yourself.

Corrective action responses are required.

Sincerely,



Paul O. Shapiro, VP and Corporate RSO

enc/

cc:

All members Radiation Protection Committee

B/85

## RTI INC

## RADIATION SAFETY CHECKLIST

Date June 20, 1990

	YES	NO
1.0 Is formal training:		
1.1 current for radiation workers?	X	
1.2 current for irradiator operators?	X	
2.0 Are current procedures available in the control room?	X	
3.0 Are records maintained of worker exposure?	X	
4.0 Is worker exposure data supplied to each worker expediently upon termination?	X	
5.0 Does documentation verify the scheduled calibration of the following equipment?		
5.1 survey instruments.	X	
5.2 area monitors.	X	
5.3 pocket dosimeters.	X	
6.0 Are all survey instruments calibrated with current calibration stickers?	X	
7.0 Are current preventive maintenance procedures available and in use?	X	
8.0 Is preventive maintenance documentation current on the:		
8.1 daily schedule?	X	
8.2 weekly schedule?		n/a
8.3 monthly schedule?	X	
COMMENT - Forklift PM for 4 & 5/90 were * w/ no date or signature		
8.4 quarterly schedule?	X	

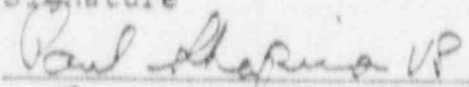
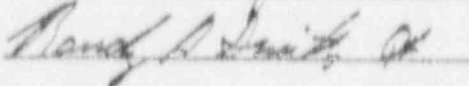
COMMENT - Test high temperature switch setting not check first quarter 90, was checked 1 day late.

- 8.6 annual schedule? X
- 9.0 Is major maintenance activity documented? X  
 COMMENT - Rewiring in cell 4/16 not documented on form as required in the procedure. It is noted in Operators log.
- 10.0 If any unusual circumstances occurred were all radiological requirements met and documented? X
- 11.0 Does the RSO review, sign and date survey documentation? X
- 12.0 Are all areas requiring radioactive posting locked, if required? X  
 COMMENT - Controlled areas by the storage pool and compressors were not locked. They were locked immediately.
- 14.0 Is resin bed regeneration documented? X
- 15.0 Is a start-up checklist available and in use? X
- 16.0 Are irradiator interlock checks documented? X
- 17.0 Are the following records current and in order:
  - 17.1 operators log? X
  - 17.2 monitoring of water purification system for:
    - 17.2.1 radiation? X
      - 17.2.1.1 monthly survey instrument checks? X
      - 17.2.1.2 monthly water samples? X
    - 17.2.2 pH? X
    - 17.2.3 conductivity? X
    - 17.2.4 temperature? X
    - 17.2.5 water level? X

- 17.3 source movement log? X  
 COMMENT - Two entries on 4/5/90 were recorded as 4/4/90
- 17.4 security log? X
- 18.0 Are records legible? X
- 19.0 Are license conditions in compliance. X
- 20.0 Is the check source used prior to entering  
 the cell? X
- 21.0 Are all monitor alarms audible as specified? X
- 22.0 Explosives flammable, or corrosives have not  
 been irradiated? X

Audit Performed By:

Name  
 Paul Shapiro \_\_\_\_\_  
 Randy Smith \_\_\_\_\_  
 \_\_\_\_\_

Signature  
  
  
 \_\_\_\_\_

Total Number of Questions - 37  
 Total Number Yes - 35\_  
 Current Percent Compliance - 95\_

FACSIMILE REQUEST

Date 7-5-90

MESSAGE TO: Mal Knapp  
(Bob Bennett's office - OUFN)

TELECOPY NUMBER: 492-0260

NUMBER OF PAGES: 5 INCLUDING THIS REQUEST FORM

MESSAGE FROM: Markus Taylor  
U.S.N.R.C. REGION I KING OF PRUSSIA, PENNA.

TRANSMITTED BY: mjf

DATE & TIME: 7:50 7/5/90

VERIFIED BY: 492-0260<sup>62</sup>

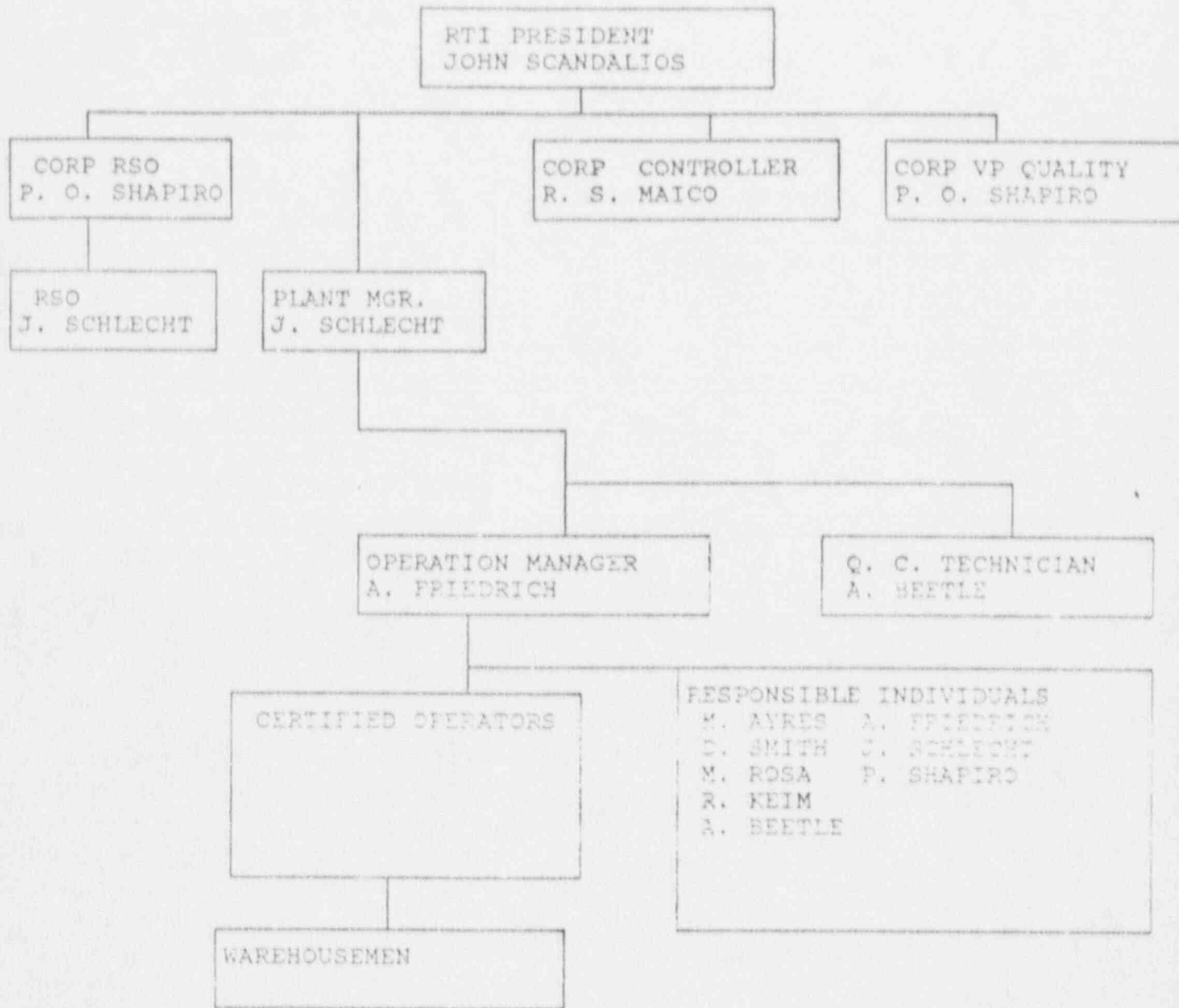
B/SK



Figure 7.1

PROCESS TECHNOLOGY OF NORTH JERSEY

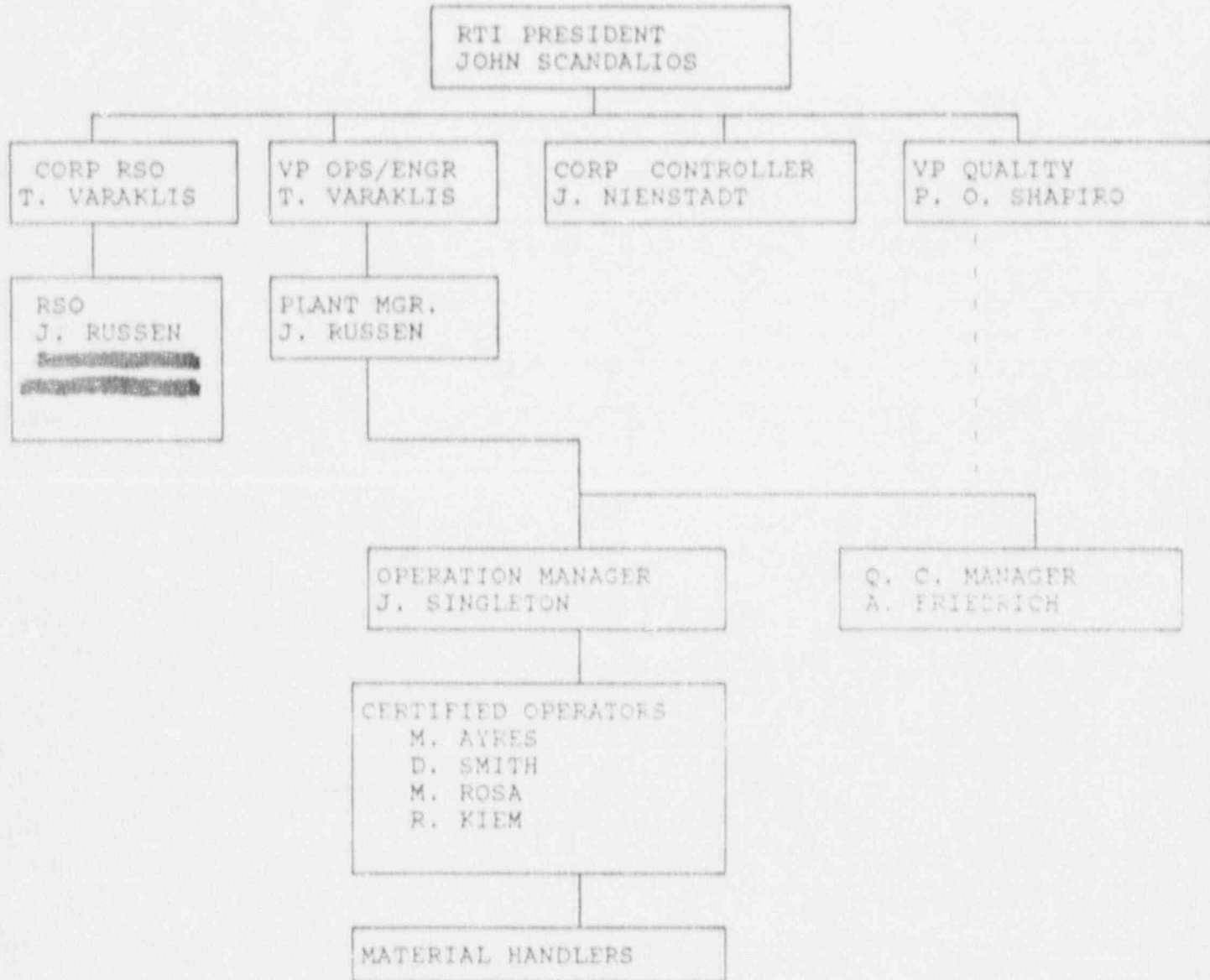
ORGANIZATIONAL CHART



1/12/90

PROCESS TECHNOLOGY OF NORTH JERSEY

ORGANIZATIONAL CHART



May 1, 1989

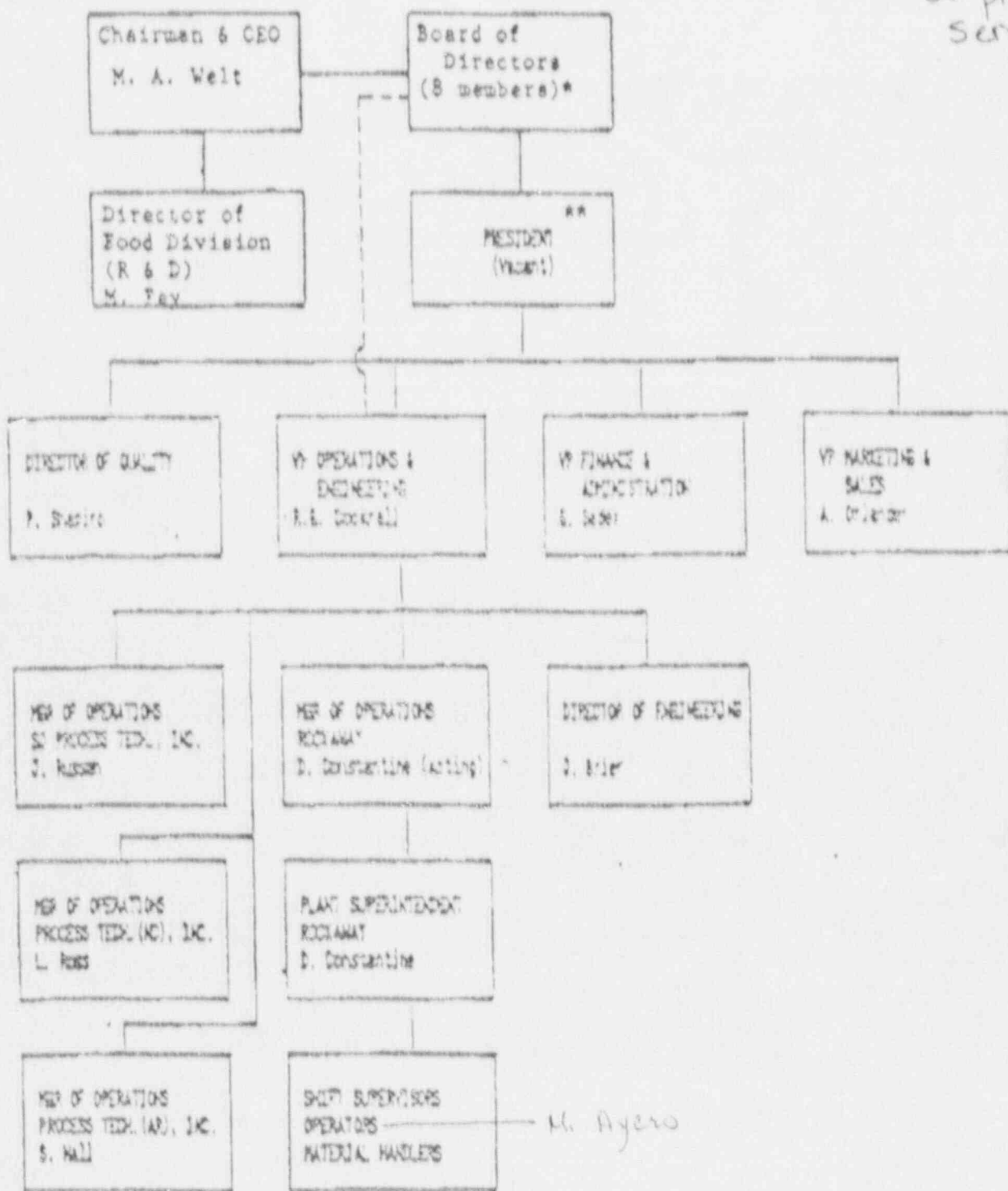
Attachment 2

Organization Chart - Operations

Radiation Technology, Inc.

June 1986

M. A. Welt  
 W. Jouris  
 T. Powell } license prohib. them from holding an off. or providing service

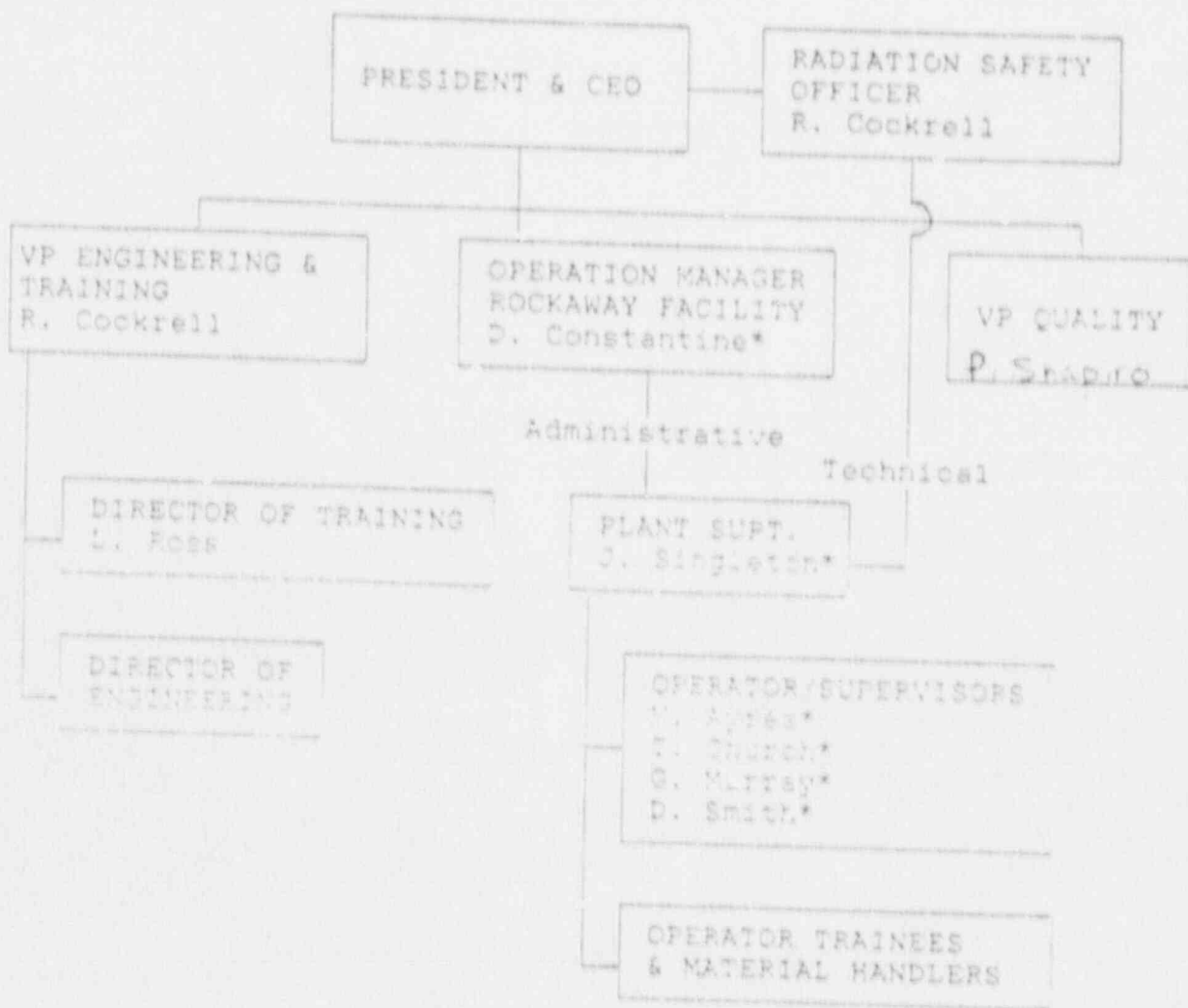


\* 5 Outside Members, 2 Inside Directors, Chairman

\*\* Transition of responsibility to new president to be done by Board action.

FIGURE 7-1

INDIVIDUALS RESPONSIBLE FOR RADIATION SAFETY



\* Certified Operator

*R. Cockrell resigned @ mid 1987*

*H. Holody*

July 9, 1990

[Deleted portions are outside the scope of the request]

*2/2/85*  
*1/2*  
*1/2*

-- Dr. Martin Welt, former Radiation Technology, Inc. (RTI) official, was prohibited by order from serving as an officer, employee, or consultant for RTI. In a series of letters, he and his family have asked if he can serve on the RTI board of directors, whether they can serve as RTI officers, employees, or directors; whether they can vote their stock as they so desire, etc. Because our responses related to the license, we sent copies to RTI. We also provided RTI copies of the incoming letters under a FOIA request.)

*SCOPE*

LIMITED DISTRIBUTION - NOT FOR PUBLIC DISCLOSURE

*B/87*

CONVERSATION RECORD

TIME 11:30 a.m.

DATE 7/12/90

TYPE

VISIT

CONFERENCE

TELEPHONE

INCOMING

OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Brad Jones

ORGANIZATION (Office, Dept, Bureau, Telephone No)

Akin, Gump, & Strause law firm 887-4558

SUBJECT

Role in the RTI enforcement matter.

SUMMARY

Today, I spoke with Brad Jones, former legal assistant for Commissioner Can to determine his new role in the RTI case. He informed me that he will be working with Roy Lessey on the case. Lessey remains to be the partner from the firm on the case. Brad, who is not a partner, indicated that he <sup>(Brad)</sup> is more accessible. Therefore, Brad stated that we can communicate orally with him. Both should be kept on correspondence and both will attend any enforcement conference that we may have. He also informed me that Bob Riley, Esq. will no longer work on the case. I asked Brad to put his new role in writing. He indicated that he would FAX it to me.

ROUTING	
NAME/SYMBOL	INT
Loe	
John W	

cc: T. Martin  
M. Knapp

ACTION REQUIRED

None

NAME OF PERSON DOCUMENTING CONVERSATION

Karla Smith

SIGNATURE

DATE

7/12/90

ACTION TAKEN

SIGNATURE

TITLE

DATE

50271-101

U.S. G.P.O. 1989-381-526/8346

CONVERSATION RECORD

OPTIONAL FORM 271 (12-76)  
DEPARTMENT OF DEFENSE

B/K