

JAN 18 1991

In Reply Refer To:
License: 35-27007-01
Docket: 30-31349/90-01

Atochem, Inc.
ATTN: Peter M. Yacoe, P.E.
Plant Manager
P.O. Box 1250
Pryor, Oklahoma 74362

Gentlemen:

Thank you for your letter of December 2nd response to our letter and attached Notice of Violation both dated December 13, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine whether full compliance has been achieved and will be maintained.

Sincerely,

Original Signed by:
LAWRENCE A. YANDELL
A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

cc:
Oklahoma Radiation Control Program Director

bcc w/copy of licensee letter:
DMB - Original (IE-07)
RDMartin
ABBeach
LAYandell
MRodriguez, OC/LFDCB (MS 4503)
CLCain
WLFisher
SRajendran
NMLS
MIS System
RIV Files (2)
RSTs Operator

RIV:NMLS *SR*
SRajendran:nh
1/16/91

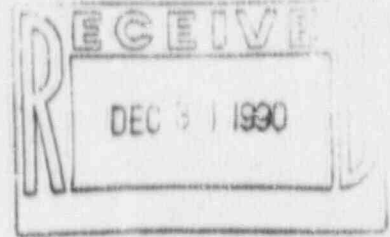
C:NMLS *WLF*
WLFisher
1/16/91

D:DRSS *AB*
ABBeach
1/17/91

240056

9101240296 910118
REG4 LIC30
35-27007-01 PDR

IE07
111



December 28, 1990

Attn: Mr. A. Bill Beach, Director
U.S. Nuclear Regulatory Commission - Region IV
Radiation Safety and Safeguards Division
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Dear Mr. Beach:

In response to your office's December 13, 1990, "Notice of Violation" for License: 35-27007-01 Docket: 030-31349/90-01, the following explanations and actions have been developed to establish compliance.

The absence of leak test records for an Ohmart series 4000 weigh scale gauge during Mr. Rajendran's August 21, 1990, inspection is the result of internal problems with Atochem's specified vendor, Ohmart. Atochem representatives were present when the leak test was performed, however, Ohmart personnel inadvertently failed to complete the actual lab analysis and documented the test with field notes only. A copy of the field notes has been enclosed for your review.

A routine 6 month leak test was performed by Ohmart on August 28, 1990. This test was properly documented and fully analyzed yielding an acceptable result for compliance. Radiation safety training was also performed for four (4) Atochem plant technicians. The field notes, field data and lab results have been enclosed for your review.

Through conversations with Ohmart, we (Atochem) have stressed our concern with their documentation performance for the March 16, 1990 leak test. Ohmart has insured that procedures will be followed completely as demonstrated during their August 28, 1990 inspection.

For future leak tests and test results Atochem's Senior Process Engineer located at Pryor will retain all necessary records to insure compliance with all applicable regulatory requirements.

~~9101090098~~ 8 pp

IC 90458

I trust that this letter and enclosures will meet the U.S. Nuclear Regulatory Commission requirements for full compliance. If there are discrepancies that need further attention please contact me at (918) 825-5570. Thank you.

Sincerely,

Tom Newman (s)
Tom Newman
Senior Process Engineer

/sls

enclosures

cc: P.M. Yacoe, Atochem
J.K. Michel, Atochem

SERVICE PURCHASED BY <i>Arochem North America</i> <i>CoLa Division</i> <i>P.O. Box 1250</i> <i>Pryor, OK 74362</i>	USER (IF DIFFERENT FROM PURCHASER) <i>Arochem</i> <i>6th & Hunt (Near Hwy 4128)</i> <i>Pryor, OK</i>
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Field Service Report No.
TULT 0146-09083

REPORT DATE: *8/28/90* SHEET OF: *1/1*

INSTRUMENT REF. <i>J. Michel</i>	VISIT PURPOSE <i>F</i>	SERVICE P.O. <i>11219</i>
RADIATION SURVEY <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO DECLINED	RADIATION SAFETY INSTRUCTION <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO DECLINED	WIPE TEST <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO DECLINED

SHOP ORDER NO.
F 9041-6961E

SERVICE SUMMARY

ITEM	GAGE MODEL NUMBER	TROUBLE* LOCATION	TROUBLE* DISC	ACTION* TAKEN	STATUS**			1ST CHANNEL		2ND CHANNEL		SPEED	RANGE SPAN
					A	B	C	STD	CAL	STD	CAL		

*SEE REVERSE SIDE FOR CODES **STATUS: A-COMPLET, B-INCOMPLETE, C-FOLLOWING UP REQ.

COMMENTS

① Wiped & Surveyed 1 Weighant 4000 "belt" scale. STRM-9 type source holder, 35 mCi, CS137, Ser. # 3500. Scale located on LHO Coal Screen Conveyor.

② Performed Basic Radiation Safety Training with 4 plant technicians.

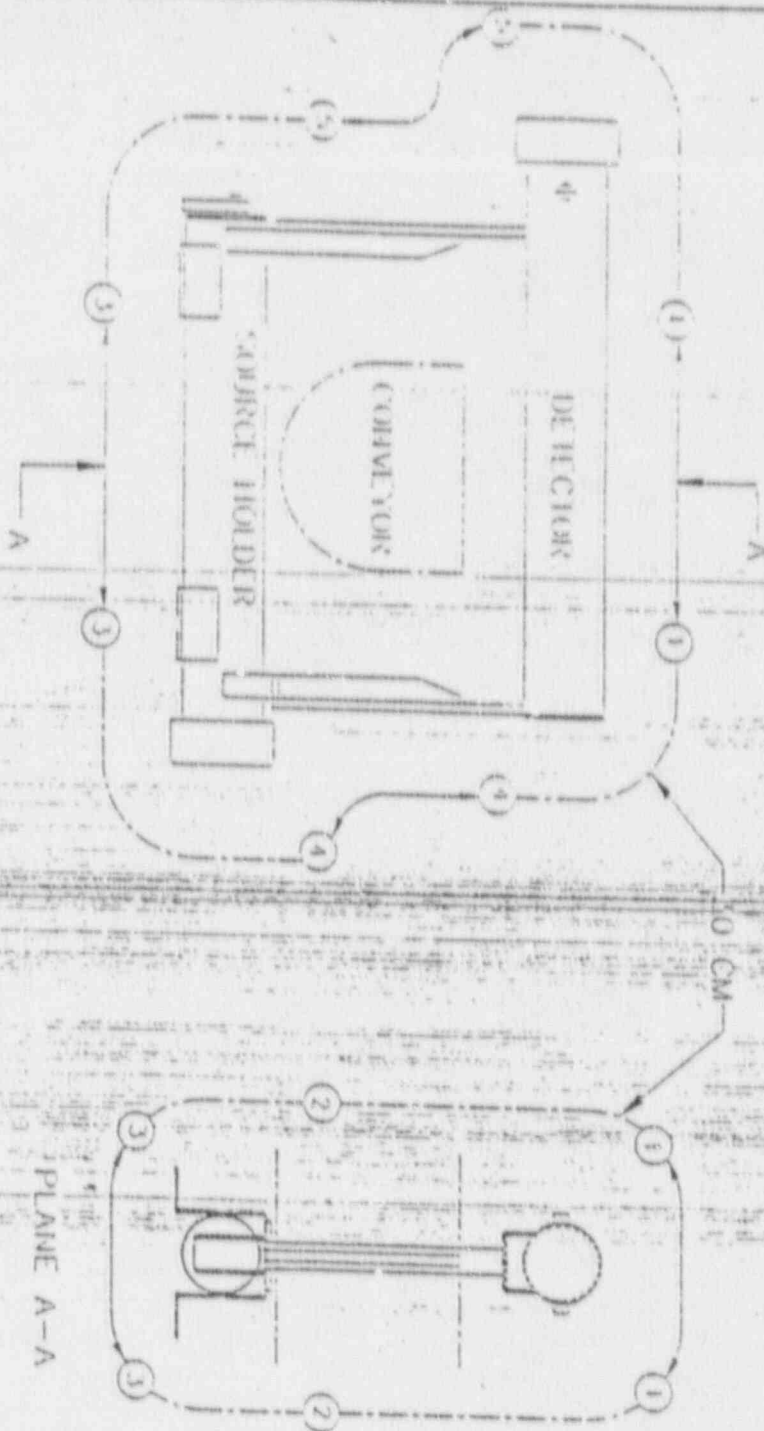
W.T. Newman
~~W.T. Newman~~

CUSTOMER ACKNOWLEDGEMENT

J. Michel 8/28/90

CUSTOMER SIGNATURE

[Signature]
 OHMART FIELD SERVICE ENGINEER



ALL READINGS ARE IN mR/hr.
 AT 30 CM (12 INCHES) (X MEANS NOT MEASURABLE ABOVE BACKGROUND RADIATION LEVEL)

POINT	SOURCE HOLDER	
	ON	OFF
*1	1	X
*2	1.5	1.5
*3	1	1.5
*4	1.5	1.7
*5	1.5	1.7

* DATA REFERENCE SUBJECTS MEASUREMENTS MADE IN A PLANE ALONG THE LENGTH OF THE SOURCE HOLDER AND THE DETECTOR

CUSTOMER OR USER

AG - Chem North America
 S.O.# F90415-08018
 FAC# OR ID# Kani Coal Mine Canada

SOURCE HOLDER MODEL 5113M
 SOURCE PART# 25-137
 SOURCE 55 mCi
 SOURCE SERIAL NO. 3560

CONVEYOR PART# X

SURVEY METER: Dosimeter
 MFR. 3035-2
 SERIAL NO. 312-1268
 LAST CAL DATE

RADIATION IS LESS THAN 5 mR/hr AT 30 CM (12 INCHES) EXCEPT AS NOTED
 *SURVEYED BY J. Jacobs DATE 8/29/50
 *POSTING REQUIRED: YES NO X
 IF YES, WHAT TYPE?

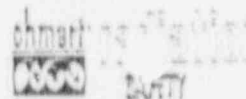
* As per 10 CFR 20.161, 20.105, 20.202

IRVING, 00-499172
 THE CHADWICK CORPORATION
 4200 WASHINGTON BLVD., WASHINGTON, D.C. 20004
 SPECIAL HIGH RADIATION SURVEY METER WITH ANTI-SCATTER ATTENUATOR, SHIELD SOURCE

C-48974

1957

The Ohmart Corporation
4241 Allendorf Drive • Cincinnati, Ohio 45209
Phone (513) 272-0131 • TLX: RCA 212071



Wipe Test Kit

*Atchem North America, Inc.
P.O. Box 1250
Pryor, OK 74132*

Kit No. *1* | Date *8/28/90*
Customer P.O. No. *11219*
FILE

Caution: This kit is to be used only for the source holder described below. The information below appears on the metallic label on the act. OHMART source holder. Supply similar information if holder not OHMART.

S.O. No. *F9071-08018* | Isotope *CS-137* | Serial No. *3500* | m.C.I. *35* | Source Holder *STHM-9*

Date Shipped *9/89* | User Identification *Law Coal Screw Conveyor* | Other

Date of Test *8/28/90* | Tested By (Tester's Signature) *[Signature]*

This kit is to be used only by those whose license permit them to perform wipe tests (Per CFR-10 Part 20)

OHMART ANALYSIS

The following are analysis results

Source is O.K. (Activity less than 0.005 μ Ci) Rewipe Required Defect

OK 32

[Signature]
Tested By/Authorized Signature | *9-13-90*
Date

cc Tom Newman



SERVICE PURCHASED BY <i>Atochem</i> <i>P.O. Box 1250</i> <i>Pryor, Ok</i> <i>74362</i>		USER IF DIFFERENT FROM PURCHASER: <i>Atochem</i> <i>MID-AMERICAN INDUSTRIAL DIST</i> <i>6th & HUNT ST</i> <i>PRYOR, OK 74362</i>		Field Service Report No.	
INSTRUMENT REF		VISIT PURPOSE		SHOP ORDER NO. <i>F 9041-06601</i>	
RADIATION SURVEY <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> DECLINED		RADIATION SAFETY INSTRUCTION <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> DECLINED		WIPE TEST <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> DECLINED	

SERVICE SUMMARY											
ITEM	GAGE MODEL NUMBER	TROUBLE* LOCATION	TROUBLE* DISC	ACTION* TAKEN	STATUS** A B C	1ST CHANNEL STRE PREG	SAL PREG	2ND CHANNEL STRE PREG	SAL PREG	SPEED	RANGE/SPAN
<i>1</i>	<i>Belt Scale</i>					<i>677</i>	<i>7417</i>	<i>900</i>	<i>OV</i>	<i>45.3F4%</i>	<i>0-7.451 lbs/ft</i>

*SEE REVERSE SIDE FOR CODES **STATUS: A-COMplete, B-INCOMPLETE, C-FOLLOWING UP REQ.

COMMENTS

3/15 Performed Wipe Test, Radiation Survey & Visual inspection of Belt Scale + Smart Pro Set up.
Set up Smart Pro for 0-7.451 (lbs) ft Loading, 10 TON/HR max total. Set up 4.20 mA out. No Tach. 906v on ch2 to simulate tach.
Calibrated on Empty Screw (7417 cts) + at 6.400 lbs/ft (6463 cts). Did DATA Collects For Linearizer Curve but I feel some data is invalid due to inconsistent loading on screw.
3/16 Called in DATA ~~FOR~~ FOR Curve + entered data to Curve I. Gage is still erratic.
Customer will modify Feed Elevator + possibly slow the screw speed down in the future to help assure steady feed rates to keep screw loading more consistent.

CUSTOMER ACKNOWLEDGEMENT

Juhl 3/16/80

 Ed Latham
 SMARTFIELD SERVICE ENGINEER

THE OHMART CORPORATION
 Worldwide Sales and Service

4241 Allendorf Dr., Cincinnati, Ohio 45209 U.S.A.
 Phone: (513) 272-0131 Fax: (513) 272-0133
 TLX: 21-2071 OHMUSA-UR



ORIGINAL PACKING LIST

The Ohmart Corporation

4241 Allendorf Drive • Cincinnati, Ohio 45209 U.S.A. • Phone (513) 272-0101 • FAX (513) 272-0100
PLEASE REMIT TO: LOCATION 00107 CINCINNATI, OHIO 45264

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0002372002
ATOCHEN INC.
CECA DIVISION
P.O. BOX 1250
FRYOR, OK

MIKE COOK

74362

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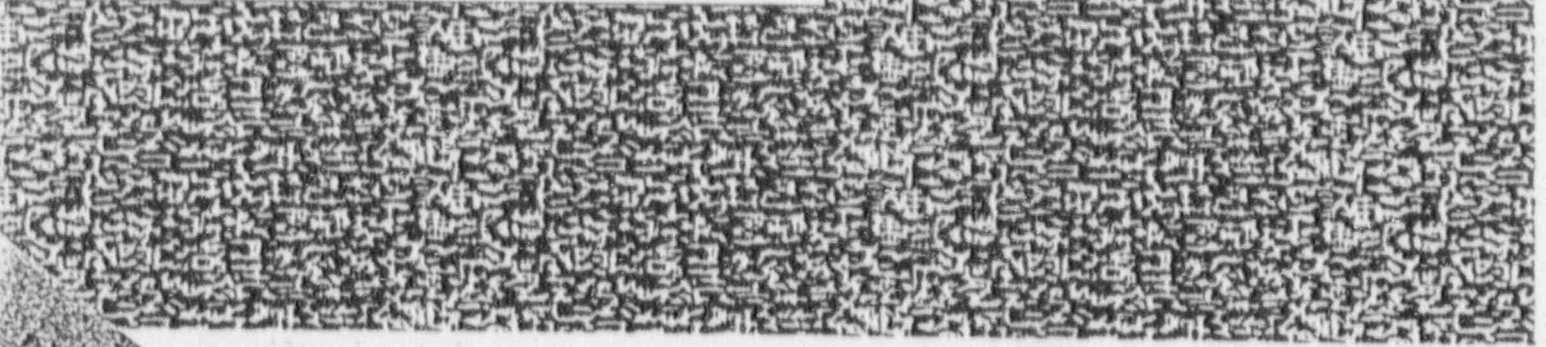
ATOCHEN INC.
CECA DIVISION
MAIF. HUNT STREET
FRYOR, OK 74362

COMPLETE

INVOICE NO.	INVOICE DATE	CUSTOMER NO.	COL	PPD	TAXABLE	EXEMPTION NO.	DATE SHIPPED
90036015	2/05/90	8757	X		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	*	2/05/90

ITEM NO.	DESCRIPTION	QUANTITY	
		SHIPPED	BACK ORDER
1	W-4600-SPECIAL SCREW CONVEYOR SCALE	1	

SHOP ORDER NO.	SHIPPED VIA
TULF-9041-08018	CONSOLIDATED



STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

CONSOLIDATED

Shipper's No. _____

Carrier's No. _____

(Name of Carrier)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

81 CINCINNATI, OHIO, FEBRUARY 5 19 90

THE OHMART CORPORATION
From 4241 ALLENDORF DRIVE, CINCINNATI, OHIO 45209

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word "carrier" as understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver at another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any portion of said property over all or any portion of said route to destination, and as to each party at any time hereafter in all or any of its property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classification (2) in effect on the date hereof, if this is a rail or a trucker shipment, or (3) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back hereof, set forth in the classification or tariff which governs the transportation of the shipment, and he hereby agrees to be bound by the terms and conditions of the said bill of lading.

Consigned to AUTOCHEM INC., CECA DIVISION, MAIP, HUNT STREET
(Mail or street address of consignee - For purposes of notification only)

Destination FRYOR, State OK 74362 County _____ Delivery Address* _____
(*To be filled in only when shipper desires and governing tariffs provide for delivery there)

Route _____

Delivering Carrier _____ Car or Vehicle Initials _____ No. _____

No. Packages	Kind of Packages, Description of Articles, Special Marks, and Exceptions	Weight (Sub. to Car)	Class. or Rate	Ch. Col.	Principal Radioactive Contents	Activity of Contents	Label Index	Type Label
1	RADIOACTIVE MATERIAL SPECIAL FORM N.O.S. (CS-137) UN 2974 () UN 2982 RADIOACTIVE MATERIAL DO NOT PLACE UNDEVELOPED FILM WITHIN 15 FEET OF THIS CONTAINER. RADIOACTIVE MATERIAL, NOI, Item No. 164900 (The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding 40¢ per pound). PLACARDS ARGON NON-FLAMMABLE GAS (DOT - E 8472). This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation, according to applicable regulations of the Department of Transportation.	310#			CS-137	.035	2	RADIOACTIVE YELLOW II LABEL APPLIE

SINGLE SHIPMENT

1	ELECTRICAL INSTRUMENTS, NOI, Item No. 61700. RECORDING DEVICES, NOI, Item No. 58240. PRINTED MATTER CUSTOMERS P.O. NO. <u>8757</u> SHOP ORDER NO. <u>TULF-9041-08018</u>	13#				Received \$ _____ to apply in prepayment of the charge on the property described herein.		
---	--	-----	--	--	--	--	--	--

183-381181

GF CC

If charges are to be prepaid, write or stamp here, "To be Prepaid."

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

If the shipment moves between two ports by a carrier by water, the law requires that the Bill of Lading shall state whether it is carrier's or shipper's weight. NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____.

The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of the Consolidated Freight Classification.

THE OHMART CORPORATION, Shipper, Per Sharon S. Security Received by _____

Permanent post office address of shipper: 4241 ALLENDORF DRIVE, CINCINNATI, OHIO 45209