



DEPARTMENT OF THE ARMY

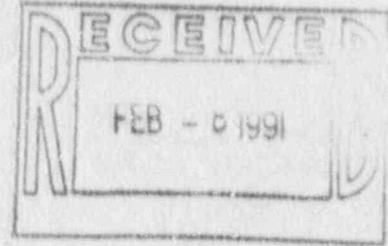
NEW ORLEANS DISTRICT, CORPS OF ENGINEERS

P.O. BOX 60267

NEW ORLEANS, LOUISIANA 70160-0267

REPLY TO
ATTENTION OF:

February 7, 1991



Safety & Occ Health Ofc

SUBJECT: Docket Number 30-17881/90-01
License Number 17-16653-02

Mr. A. Bill Beach, Director
U. S. Nuclear Regulatory Commission
Region IV
Division of Radiation Safety and
Safeguards
611 Ryan Plaza Drive, Suite 1000
Arling n, Texas 76011

Dear Mr. Beach:

This is in response to your letter dated January 11, 1991, which identifies specific NRC violations. We are responding to those violations in the order they appear in Appendix A.

Item A. Specified Procedures For The Disposal Of Licensed Material Are To Be Observed In Accordance With 10 CFR 20.301.

1) The gas chromatograph was unintentionally and improperly disposed of and was tracked as far as a scrap metal facility in Gulfport, Mississippi. We have concluded that the gas chromatograph, along with the Ni63 sources, has been melted down.

2) We have attached identifiable labels imprinted with handling and disposal instructions to the remaining two gas chromatographs. Our investigation indicated that if the radioactive symbols had been visible on this equipment, Logistics Management Office personnel and Defense Reutilization Management Office personnel would have identified them and returned them to the owner.

3) Both holders of radioactive sources have been instructed not to turn in or transfer any of this equipment without first coordinating with personnel of the U. S. Army Corps of Engineer Safety and Occupational Health Office in Washington, D.C.

4) New, special bar codes have been affixed to the equipment containing radioactive sources. These bar codes will

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insure that any logistics action will produce a warning that the equipment contains radioactive material. All actions concerning this material will require prior approval from the Corps of Engineer Safety and Occupational Health Office in Washington, D.C.

5) A District Radiation Protection Officer has been appointed to oversee the radiation safety program.

Item B.1. "Caution Radioactive Material" Signs Are To Be Posted Where Licensed Material Is Used In Accordance With 10 CFR 20.203(e)

1) Although not required by the exception in 10 CFR 20.204 (a), when the Water Quality Lab was relocated from Research Drive to our current building, the radiation signs were not re-posted.

2) All entrances to the area containing radioactive sources are currently posted with the standard yellow and magenta "Caution Radioactive Material" signs.

Item D.2. License Documents Are To Be Posted In Accordance With 10 CFR 19.11(a) and (b) and 10 CFR 19 and 20.

1) When the Water Quality Lab was relocated, the appropriate documents were not re-posted.

2) Forms NRC-3, "Notice to Employees," are currently posted on the entrances to the room containing the radioactive material. A copy of the license, the application for license, 10 CFR Parts 19 and 20, the notification of violations, this letter, and a notification of the location of the operating manual for the gas chromatographs are posted at the entrance.

Item C.1. Sealed Sources Are To Be Tested For Leakage And/Or Contamination At Six-Month Intervals In Accordance With License Condition 13.

1) The wipe tests were not done because of the chemist's misunderstanding of Condition 13 of the license concerning wipe testing equipment which is not in use.

2) The wipe tests of the sources in the gas chromatographs have been performed, and we are currently awaiting analysis. The wipe tests results report will be also be posted when it is returned to us by the analyzing laboratory.

3) A log of the inventories and the wipe tests of the gas chromatograph is posted on the entrance door along with instructions that they be performed every six months. The wipe tests will be performed at the same time as the inventories.

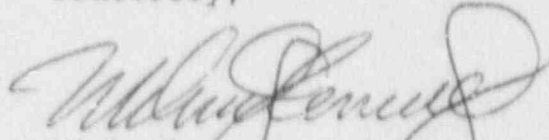
Item C.2. Sources And Devices Require A Physical Inventory At Six-Month Intervals In Accordance With License Condition 15.

1) The gas chromatograph which was improperly disposed of was last accounted for in September of 1986 when the transfer paperwork was initiated. All other gas chromatographs have been accounted for on an annual L. 's. Inventory list is enclosed.

2) An inventory and wipe test log has been affixed to the entrance to the room containing the gas chromatographs.

3) New, special bar codes have been affixed to the remaining gas chromatographs which require scanning every six months. The gas chromatographs were scanned on August 7, 1990 and February 1, 1991. Inventory list is enclosed.

Sincerely,



Michael J. Conrad Jr.
Major, U. S. Army
Acting District Engineer

Enclosures



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NEW ORLEANS DISTRICT, CORPS OF ENGINEERS

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3) Both holders of radioactive sources have been instructed not to turn in or transfer any of this equipment without first coordinating with personnel of the U. S. Army Corps of Engineer Safety and Occupational Health Office in Washington, D.C.

4) New, special bar codes have been affixed to the equipment containing radioactive sources. These bar codes will

~~Approved~~
APP

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Item C.1. Sealed Sources Are To Be Tested For Leakage And/Or Contamination At Six-Month Intervals In Accordance With License Condition 13.

1) The wipe tests were not done because of the chemist's misunderstanding of Condition 13 of the license concerning wipe testing equipment which is not in use.

2) The wipe tests of the sources in the gas chromatographs have been performed, and we are currently awaiting analysis. The wipe tests results report will be also be posted when it is returned to us by the analyzing laboratory.

3) A log of the inventories and the wipe tests of the gas chromatograph is posted on the entrance door along with instructions that they be performed every six months. The wipe tests will be performed at the same time as the inventories.

Item C.2. Sources And Devices Require A Physical Inventory At Six-Month Intervals In Accordance With License Condition 15.

1) The gas chromatograph which was improperly disposed of was last accounted for in September of 1986 when the transfer paperwork was initiated. All other gas chromatographs have been accounted for on an annual basis. Inventory list is enclosed.

2) An inventory and wipe test log has been affixed to the entrance to the room containing the gas chromatographs.

3) New, special bar codes have been affixed to the remaining gas chromatographs which require scanning every six months. The gas chromatographs were scanned on August 7, 1990 and February 1, 1991. Inventory list is enclosed.

Sincerely,

Michael J. Conrad Jr.
Major, U. S. Army
Acting District Engineer

Enclosures

PREPARED: 27 AUG 90 09:18 VIC: K
 HRA: 104

ACCOUNTABLE PROPERTY INVENTORY SYSTEM
 BAR CODE RECONCILIATION

PCN: YAP-391

PART: 1 ** RECYCLED **

PRDP TAG-NO	DESCRIPTION	MAKE	MODEL	LOCATION	SERIAL-NO	KEY
		OLD TAG PART-NO	LSH ADD-INFO	BLDK ROOM		
21870	MONITOR	APPLE		NODN 115	B2H059845	W
21871	KEYBOARD FOR MICROCOMPUTER	APPLE		NODN 115	436339	W
21872	DISK DRIVE	APPLE		NODN 115	704723	W
21873	POWER SUPPLY UNIT FOR R ADP EQUIPMENT			NODN 115		W
21874	POWER SUPPLY UNIT FOR R ADP EQUIPMENT			NODN 115		W
21875	TERMINAL	PERKIN-ELM	1100	NODN 115	102971	W
21876	DATA LOGGER	PERKIN	SIGMA	NODN 115	036714\01018	W
21877	ANALYZER GAS CHROMAT		SIGNAL	NODN 115	086714011078	W
21878	PUMP VACUUM	ALCATEL		NODN 115	M20084	W
21879	PUMP VACUUM			NODN 115	M2004A	W

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PREPARED: 12 JUL 88 15:03

UIC: K

PROPERTY INVENTORY LIST

PCN: YAP-551

ISSUING OFFICER: S SERWAY

WATER QUALITY LAB

CATG: CIVIL, MILITARY, REVOLVING, DSSM O/R
H/R ACCT: 104

DATE OF LAST INV: 88/05/16

OP LG-NO	NOMENCLATURE	MAKE		MODEL	LOCATION		ACQ DATE	DOCU NO	CATG CODE	COND CODE	UNIT COST	SERIAL NO
		OLD TAG PART-NO	WID HGT		BLDG ROOM	LGH COLOR ADD-INFO						
132	TELEPHONE SINGLE LIN	AT&T		2500	NOON	115	880412		D	PA	\$ 144.50	
133	TELEPHONE SINGLE LIN	AT&T		2500	NOON	115	880412		D	PA	\$ 144.50	

TOTAL COST \$ 164675.54
TOTAL QUANTITY 453

I HAVE CONDUCTED A 100 PERCENT PHYSICAL INVENTORY OF THE
PROPERTY LISTED ON THIS HAND RECEIPT. ALL PROPERTY ON
HAND NOT INCLUDED ON A HAND RECEIPT HAS BEEN REPORTED
AND ALL DISCREPANCIES ACCOUNTED FOR IN ACCORDANCE WITH
AR 735-11.

Stephen T. Serway - -65 11/2 7-17-88
SIGNATURE OF HAND RECEIPT HOLDER GRADE/RANK DATE

PREPARED: 07 AUG 90 09:18 VICT: K
 HRA: 104

ACCOUNTABLE PROPERTY INVENTORY SYSTEM
 BAR CODE RECONCILIATION

PCN: VAP-391

PART: I ** RECONCILED **

PROP PAR-NO	DESCRIPTION	MAKE MID	HTG HGT	MODEL LSH COLR ADD-INFO	LOCATION BLDG ROOM	SERIAL-NO	KEY
21882	CONTROL AUTO SAMPLER				NOON 115	097	W
21883	VARIABLE GIVE LENGTH DETECTOR	VARIAN			NOON 115	254030	W
21884	LIQUID CHROMATOGRAPH	VARIAN			NOON 115		W
21885	DATA LOGGER & CONTROL LER	VARIAN		COS401	NOON 115		W
21886	GAS CHROMATOGRAPH	VARIAN		03464010	NOON 115		W
21887	STEEL STEP				NOON 115		W
21888	AUTO SAMPLER			8000	NOON 115	22151653-04	W
21889	RECORDER STRIP CHART	OMNI SCRIB			NOON 115	RS/6015-109	W
21890	ULTRA VIOLET DETECTOR	VARIAN		430020-02	NOON 115	06550451-01	W

*Scanned with
 W = scanned with*

21874	POWER SUPPLY UNIT FOR R ADP EQUIPMENT			NOON 115	880516						
21875	TERMINAL	PERKIN-ELM	1100	NOON 115	880516	R	A	\$	0.00	102971	
21876	DATA LOGGER	PERKIN	SIGMA	NOON 115	880512	R	A	\$	0.00	086714001018	
* 21877	ANALYZER GAS CHROMAT OGRAPH		SIGMAI	NOON 115	780810	R	A	\$	38063.43	086714001078	✓
21878	VACUUM PUMPS	ALCATEL		NOON 115	880516	R	A	\$	0.00	M2008A	
21879	VACUUM PUMPS			NOON 115	880516	R	A	\$	0.00	M2004A	

PAGE 1

PREPARED: 12 JUL 88 15:63

UIC: 4

PROPERTY INVENTORY LIST

PCN: YAP-551

CATG: CIVIL, MILITARY, RECEIVING, OSSW O/R
H/R ACCT: 104

HAND-RECPT HOLDER: S SERVAY

WATER QUALITY LAB

DATE OF LAST INV: 88/05/16

PROP TAG-NO	NOMENCLATURE	MAKE OLD YAG WID HGT PART-NO	MODEL LGH COLOR ADD-INFO	LOCATION BLDG ROOM	ACQ DATE	DOCU NO	CATG CODE	COND CODE	UNIT COST	SERIAL NO	
21880	HOT PLATE	LINDBERG	53015	NOON 115	880516		R	A	\$	0.00	787006
21881	AUTOSAMPLER	VARIAN	8055	NOON 115	880516		R	A	\$	0.00	59770451-04
21882	CONTROL AUTO SAMPLER			NOON 115	880516		R	A	\$	0.00	007
21883	VARIABLE WAVE LENGHT DETECTOR	VARIAN		NOON 115	880516		R	A	\$	0.00	254000
21884	LIQUID CHROMATOGRAPH	VARIAN		NOON 115	880516		R	A	\$	0.00	
21885	DATA LOGGER & CONTROL LER	VARIAN	COS401	NOON 115	880516		R	A	\$	0.00	
* 21886	GAS CHROMATOGRAPH	VARIAN		NOON 115	880516		R	A	\$	0.00	
21887	STEP STOOL METAL			NOON 115	880516		R	A	\$	0.00	
21889	RECORDER STRIP CHART	OMNI SCRIB		NOON 115	880516		R	A	\$	0.00	R5/6016-10

PREPARED: 21 AUG 89 14:32 JICI R
 HAND-RECEIPT HOLDER: S SERVA WATER QUALITY LAB

PROPERTY INVENTORY LIST
 CATEG: CIVIL, MILITARY, REVOLVING, PROJ O/R
 M/R ACCT: 109
 DATE OF LAST INVT: 89/07/13
 PCN: YAA-551

PROJ TAG-NO	NOMENCLATURE	OLD TAG NO	MAKE	MODL	LOCATION	ACQ DATE	DOCU NO	CATG CODE	COND CODE	UNIT COST	SERIAL NO
62233	POWER SUPPLY UNIT P9 R ADP EQUIPMENT		INMAC	8205-1	NOOV 115	88117	IM199-ED	R	A	\$ 124.00	15752
52240	POWER SUPPLY UNIT P9 R ADP EQUIPMENT		INMAC	8205-1	NOOV 115	88117	IM199-ED	R	A	\$ 124.00	15751
62269	WATER PURIFICATION S SYSTEM MANIFESTAD MODE L		WATER-1	0228	NOOV 115	88119	5089-015	R	A	\$ 814.78	88090148
52363	INTEGRATOR SIGNAL/R EMOTE	09037-21		33764	NOOV 115	890103	IM19926C	R	A	\$ 1835.40	2841405245
91129	TELEPHONE DIGITAL SS		PIXT	2404	NOOV 115	880412		O	PA	\$ 544.00	
91130	TELEPHONE SINGLE LIN		ATXI	2500	NOOV 115	880412		O	PA	\$ 144.50	
91131	TELEPHONE SINGLE LIN		ATXI	2500	NOOV 115	880412		O	PA	\$ 144.50	
91132	TELEPHONE SINGLE LIN		ATXI	2500	NOOV 115	880412		O	PA	\$ 144.50	
91133	TELEPHONE SINGLE LIN		ATXI	2500	NOOV 115	880412		O	PA	\$ 144.50	

TOTAL COST \$ 558135.33
 TOTAL QUANTITY 469

I HAVE CONDUCTED A 100 PERCENT PHYSICAL INVENTORY OF THE
 PROPERTY LISTED ON THIS HAND RECEIPT. ALL ASSETS ON
 HAND NOT INCLUDED ON A HAND RECEIPT HAS BEEN REPORTED
 AND ALL DISCREPANCIES ACCOUNTED FOR IN ACCORDANCE WITH
 AR 735-5.

Stephen T. Henry
 SIGNATURE OF HAND RECEIPT HOLDER GRA E/RANK DATE 65-11 8/28/89

PART: I ** RECONCILED **

PROP TAG-NO	NONECLATURE	MAKE	MODEL	LOCATION	KEY	
		QID TAG MID HGT PART-NO	LGH COLPR ADD-INFO	BLDG ROOM	SERIAL-NO	
21877	ANALYZER GAS CHROMAT GRAPH		SIGMAI	NOON 115	086714001978	W

21886	GAS CHROMATOGRAPH	VARIN	30464010	NOON 115		W
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RECONCILE COMPLETED

*****END PART I *****

PREPARED: 21 AUG 89 14:33 UIC: K
 HAND-RECD HOLDER: S SERVAV WATER QUALITY LAB
 PROPERTY INVENTORY LIST
 CATG: CIVIL/MILITARY/REVOLVING/PROD O/R
 H/R ACCT: 104
 DATE OF LAST INV: 89/07/15
 PCN: VAP-551

PROP TAG-NO	DESCRIPTION	MAKE	MODEL	LOCATION	ACQ DATE	DOCU NO	CATG CODE	COND CODE	UNIT COST	SERIAL NO
21874	POWER SUPPLY UNIT FQ R ADP EQUIPMENT			NOOV 115 CIA	880516		R	A 5	530.00	
21873	TERMINAL	PERKIN-ELM	1100	NOOV 115 CIA	880515		R	A 5	0.00 102971	
21876	DATA LOGGER	PERKIN	SIGMA	NOOV 115 CIA	880512		R	A 5	0.00 086714091018	
*21877	ANALYZER GAS CHROMAT 099APM		SIGNAL	NOOV 115 CIA	780910		R	A 5	19063.43 086714001079	
21878	PUMP VACUUM	ALCATEL		NOOV 115 CIA	880516		R	A 5	0.00 M2008A	
21879	PUMP VACUUM			NOOV 115 CIA	880516		R	A 5	0.00 M2009A	
21880	NOI PLATE	LINDBERG	51015	NOOV 115 CIA	880516		R	A 5	0.00 787006	
21881	AUTOSAMPLER	VARIAN	COSYLL	NOOV 115 CIA	880515		R	A 5	0.00 59770451-04	
21882	CONTROL AUTO SAMPLER			NOOV 115 CIA	880516		R	A 5	0.00 007	
21883	VARIABLE WAVE LENGTH DETECTOR	VARIAN		NOOV 115 CIA	880586		R	A 5	0.00 254000	
21884	LIQUID CHROMATOGRAPH	VARIAN		NOOV 115 CIA	800905		R	A 5	0.00	
21885	DATA LOGGER & CONTROL LER	VARIAN	COSYOL	NOOV 115 CIA	880516		R	A 5	0.00	
*21886	GAS CHROMATOGRAPH	VARIAN	00464110	NOOV 115 CIA	810818		R	A 5	0.00	
21887	STOOL STEP			NOOV 115 CIA	880516		R	A 5	0.00	
21888	AUTO SAMPLER		8500	NOOV 115 CIA	880812		R	PA 5	0.00 20151651-04	