



# VALENTEC OLIVETTE

Valentec International Corporation  
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Docket No. 040-08937  
License No. SUB-1501

December 14, 1990

U.S. Nuclear Regulatory Commission  
Region I  
Attn: John D. Kinneman, Chief  
Division of Radiation Safety  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

Subject: Notice of Violation

Gentlemen:

On November 16, 1990, Valentec Product Development Center received a written Notice of Violation resulting from the inspection conducted by C.T. Oberg on August 22, 1990. As a result of the deficiencies cited in the Notice of Violation, Valentec committed to the following corrective action:

- 1) The Valentec Product Development Center is being relocated to the Valentec Olivette Headquarters in St. Louis, MO. This transition will allow upper management review and close control of day to day operations of our R & D, Production, and NRC Regulated Activities.
- 2) An application for termination of the license currently issued for the Product Development Center and decommissioning of the facility will be submitted to the NRC. This request will be filed before December 30, 1990.
- 3) All licensed material will be transferred to the Valentec Olivette facility ( License SUC-1517 ) by December 21, 1990. The transfer of this material will be controlled by the Valentec Olivette RSO, Dale Windsor, and its management control program and conducted by certified professionals.

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1.

- 4) A radiation and contamination level survey was immediately conducted on all the equipment and total facility at the Product Development Center by the Valentec Olivette RSO on December 9, 1990. This survey indicated that loose contamination was below 5 dpm/100 cm<sup>2</sup> and radiation levels were below 0.04 mrem/hr except for the DU vault which was below 5.0 mrem/hr.
  
- 5) Due to the shut down of the Valentec Product Development Center, as of December 14, 1990, the Product Development Center acting Radiation Safety Officer, T. Murray, will no longer be employed by Valentec due to lay off procedures. His responsibilities are now the responsibility of MR. Dale Windsor the Valentec Olivette Environmental Systems Manager and RSO.

We feel that the transfer of responsibilities and licensed material to the Valentec Olivette licensed facility will assure that all Title 10 Code of Federal Regulations will be complied with. The Valentec Olivette facility has a Complete Radiation Safety Program instituted by Management including;

- a. complete management control with support staff including a Health and Safety Committee for audit and review.
- b. complete indoctrination and training of personnel
- c. computer tracking of licensed material
- d. computer control and monitoring of dosimetry
- e. extensive detection equipment

In response to the specific violations outlined in the Notice of Violation;

- A. Licensee failed to verify the transferee's authorization to receive source material.

Corrective Action: A request has been issued to all past transferees for their license authorizations which will be placed and maintained on file at Valentec Olivette.

B.

1. Neither the RSO or DRSO identified under the license were available.

Corrective Action: The termination of the license and transfer of responsibilities to Valentec Olivette will assure that the material is used by or under the supervision of a qualified RSO and qualified control plan.

2. Dosimetry (TLD) was not processed every three months. Calibration of equipment was not conducted every six months.  
A physical inventory was not conducted every six months.

Corrective Action: The TLD rings which were used for one year will be sent out and correctly interpreted at the time of license termination. The equipment will be calibrated and then placed into the calibration program at Valentec Olivette. A final inventory will be conducted and reported at the time of license termination.

3. The DU room was not locked.

Corrective Action: The termination of the license and transfer of responsibilities to Valentec Olivette will assure that the material is used by or under the supervision of a qualified RSO. The DU areas are secured by restricted access card readers.

4. Daily, biweekly, and monthly surveys were not recorded.

Corrective Action: A radiation and contamination level survey was immediately conducted on all the equipment and total facility at the Product Development Center by the Valentec Olivette RSO. This survey was conducted after the operations had been shut down. Additional surveys will be conducted prior to and at the time of license decommissioning.

5. The monthly reports were not submitted to file.

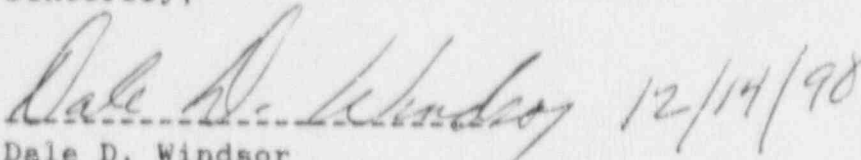
Corrective Action: The termination of the license and transfer of responsibilities to Valentec Olivette will assure that reports are submitted to file as this is standard operating procedure for NRC regulation.

C. The DU area did not have the required posting.

Corrective Action: The termination of the license and transfer of responsibilities to Valentec Olivette will assure that the material is retained in a correctly posted area.

If you require any additional information, please contact Dale Windsor at (314) 997-6656.

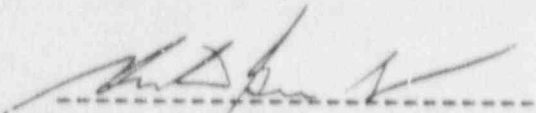
Sincerely,

 12/14/98

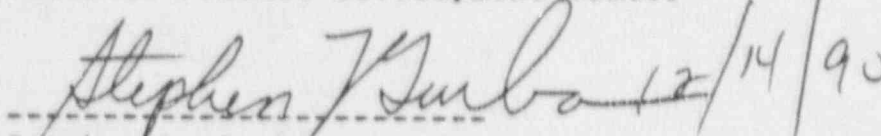
Dale D. Windsor  
Environmental Services Manager  
RSO Valentec Olivette



Tom Murray  
Acting RSO  
Valentec Product Development Center



Victor Guadagno  
Vice President/General Manager  
Valentec Product Development Center

 12/14/98

Stephen L. Gurba  
President  
Valentec Olivette

CC: Public Document Room (PDR) 12/15/98  
Nuclear Safety Information Center (NSIC)  
State of New Jersey