

Hayden | Wegman

Consulting Engineers

January 4, 1991

Mr. John R. White, Chief
Nuclear Materials Safety Section C
Division of Radiation Safety and Safeguards
United States Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, Pennsylvania 19406

Reference: **Materials License No. 06-20859-01**
Docket No. 030-21273
Notice of Violation
Hayden-Wegman Corrective Steps

Dear Mr. White:

Pursuant to your letter dated December 12, 1990 regarding the routine safety inspection by Mr. A. Kirkwood and subsequent "Notice of Violation," the statements herein provide an explanation of the corrective steps taken by Hayden-Wegman, Inc. in order to be in compliance with our materials license.

As was explained by Mr. Otto Wieand of our office in a telephone conversation with Mr. Kirkwood, Hayden-Wegman has undergone some reorganization which has resulted in the closing of our office in Farmington, Connecticut. Consequently, records of previous usage have been placed in storage. Regrettably, all personnel involved in the past use of the gauges are no longer employed by Hayden-Wegman, making the recovery of any records difficult at best.

As a result of this situation, the nuclear gauges have been acquired for use by our Buffalo, New York, office. It is our intention to maintain and operate each of the gauges from this location. Records for each of the gauges shall be kept at our Buffalo facility. Duplicate records for past leak tests and film badge exposure results have been obtained from Troxler Laboratories and R.S. Landauer Jr. and Co., respectively. All equipment maintenance shall also be performed at our Buffalo office.

In addition, whereas the New York State Department of Labor maintains jurisdiction throughout the State for the regulation of radioactive materials, an application for materials license has been made to New York State. It is also our intention to retain our NRC license as well.

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Hayden-Wegman is confident that our reorganization will provide the necessary improvements in record-keeping to avoid further violations. Record keeping of all gauge use at our Buffalo office shall be conscientiously maintained, and we anticipate to be in full compliance with our license on or before March 31, 1991.

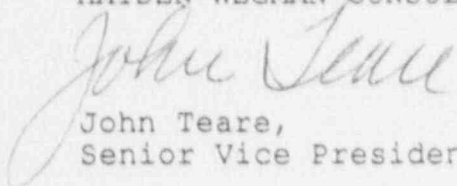
To summarize, the following corrective steps are being taken by Hayden-Wegman to achieve compliance with our materials license:

1. Hayden-Wegman will maintain and operate the gauges from our Buffalo office.
2. All records of gauge use at our Buffalo office shall be maintained in accordance with our license.
3. A materials license shall be obtained from the New York State Department of Labor.
4. Compliance shall be achieved on or before March 31, 1991.

We trust that these corrective steps will meet with your approval. Should you have any questions, do not hesitate to contact the undersigned.

Very truly yours,

HAYDEN-WEGMAN CONSULTING ENGINEERS


John Teare,
Senior Vice President

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