



January 10, 1991

LFE
Corporation

A Mark IV Company

Mr. John D. Kinneman, Chief
Nuclear Materials Safety Section B
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Road
King of Prussia, PA 19406

Ref: Docket No. 030-04598
License No. 20-01382-02

Dear Mr. Kinneman:

This letter responds to your letter of January 3, 1991 concerning routine inspection No. 90-001. In this letter I will address the notice of violation which accompanied your letter. In a separate letter I will provide a complete description of the acquisition of LFE by Mark IV Industries. I am awaiting some information from corporate headquarters for that letter.

Violation A concerns cleaning personnel who require access to a restricted area to perform their jobs. I have completed a course of training for these people. Training included recognition of radiation symbols, biological effects, and precautions and procedures to be followed to minimize radiation exposure. Full compliance has been achieved.

Violation B concerns the perimeter of the Production area which is a restricted area. Instead of using chains to restrict the area, I have found a better solution. I found rope in the colors magenta and yellow. The Production area is designated by a rope barrier as well as "Caution - Radiation Area" signs at the perimeter. Full compliance has been achieved.

Violation C concerns the reported whole body radiation dose of 1380 millirems to an individual in the first quarter of 1989. When a dose of 960 millirems was reported for the month of January 1989, I began investigation immediately. I discovered that some portion of the dose was recorded on the film badge when the individual left his badge in a radiation field overnight. I was unable to determine the amount of this exposure. The individual involved was assisting in a

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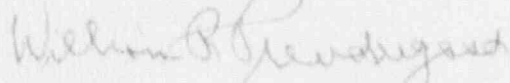
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special project outside his normal duties during January 1989 and the first half of February 1989. The project involved nuclear sensor research and development. As a result, his radiation exposure was much higher than it is when he is performing his normal duties. Following my investigation, I discussed with him basic radiation principles leading to minimizing exposure to radiation and proper care of his film badge. He is not likely to be involved in such a special project in the future. His total whole body exposure for the last three quarters of 1989 was 160 millirems and for the first three quarters of 1990 was 230 millirems. Full compliance has been achieved.

Violation D concerns the failure to report the radiation dose discussed with violation C. When I received the report of a whole body dose of 960 millirems for the month of January 1989, I began an investigation and made a report to the Commission on March 6, 1989. The reported first quarter whole body dose was 1380 millirems, most of which occurred in January 1989. Please consider this letter to be a report of the exposure of an individual in a restricted area to a whole body dose of 1380 millirems. Full compliance has been achieved.

I trust that I have provided a satisfactory response to the notice of violation. I wish to commend Mr. Kirkwood on the thoroughness of his inspection and for the professional manner in which it was carried out.

Very truly yours,
LFE Corporation



William R. Prendergast
Radiation Safety Officer

-SW

March 6, 1989

Director
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

REFERENCE: License 20-01382-02

Dear Sir:

I wish to report to you that the film badge used by Luis Rodriguez of this company showed a whole body exposure of 960 millirems and a skin exposure of 2390 millirems for the month of January 1989. A review of the film indicated no abnormalities.

Mr. Rodriguez is frequently exposed to small amounts of radiation while performing his duties at LFE. For the entire year of 1988 his whole body exposure was 1260 millirems and his skin exposure was 1950 millirems. He commenced his present duties in December 1983 and was issued a film badge at that time. His accumulated whole body exposure through December 1988 was 2120 millirems and his accumulated skin exposure for the same period was 2810 millirems.

I conducted an investigation into the January 1989 exposure. Mr. Rodriguez was involved in a special research project that brought him in contact with radiation much more frequently than his normal job requires. This project has been completed. Also, Mr. Rodriguez may have left his badge in a small radiation field overnight. I reviewed basic radiation protection principles with him and pointed out that he should keep radiation exposure as low as possible while carrying out the duties of his job. Also, I discussed with him the proper care of his film badge. It was agreed that he would leave his film badge in his tool box overnight.

Very truly yours,

LFE CORPORATION

William R. Prendergast
Radiation Safety Officer

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