



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
785 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

JAN 21 1989

MEMORANDUM FOR: License File

Minnesota Mining and Manufacturing Co. (3M)
St. Paul, MN

NRC License No. 22-00057-326
22-00057-06

FROM: Bruce S. Mallett, Chief, Nuclear Materials
Safety Branch

SUBJECT: 3M REPORTS IN RESPONSE TO NRC FEBRUARY 18,
1988 ORDER MODIFYING LICENSE

Robert Wissink and Richard Murphy of 3M and I held a telephone conference on January 13, 1989 to discuss the type of information 3M needs to provide to the NRC in future reports. The conference was initiated by both 3M and NRC to reach an agreement on information that 3M needs to provide in response to the February 18, 1988 Order and to aid the NRC and 3M in followup on status of returned and unreturned static eliminators. The following is a summary of the discussion:

1. Returned Devices

3M will modify the written monthly report submitted to NRC to include 4 categories of returned devices:

- a. Those devices for which 3M or the general licensee has a proof of delivery to 3M (POD) but 3M records are not clear as to whether the devices have been checked into their system. These devices will not be considered lost.
- b. Returned devices from which there is no measurable leakage of Po-210.
- c. Returned devices from which there is measurable leakage at less than 0.005 uCi.
- d. Returned devices from which there is measurable leakage at greater than 0.005 uCi.

3M will provide an alphabetical listing for each of these categories including the information currently supplied in the computer listing sent to the NRC in the monthly report. Due to programming problems, 3M may not be able to provide these listings by State.

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On the cover letter for the monthly report, 3M will provide a summary of the following:

- a. Total number of devices distributed
- b. Total number of devices returned
- c. Total number of returned devices in each of the 4 categories listed above

3M will maintain a file for the categories where there is measurable leakage from the devices at 3M for review by the NRC. The file will include status of customer notification, NRC or Agreement State notification, survey and cleanup of the customer site and name and location of the customer.

The information listed above will be included in future monthly reports for the non-critical industries. All devices have been returned from the critical industries (food, beverage, cosmetic, drug and medical device). 3M will provide one report to the NRC including this information for the critical industries.

2. Unreturned Devices

3M will modify the monthly report submitted to the NRC to include the following categories of unreturned devices:

- a. Lost devices (these will be defined as those that are truly lost as verified by the customer and 3M has sent the customer a letter to report to the NRC or Agreement State as appropriate; these will also include those where the customer has gone out-of-business)
- b. Unreturned devices (these will be defined as those still in use by the customer whether by exemption or the customer's lease has terminated and the customer is delinquent or the customer still has a valid lease but is still using the device)
- c. Other (these will be defined as those where 3M has no evidence that the devices have been returned but the customer claims the devices have been returned; these will also include devices damaged at one time and no longer available)

3M will provide an alphabetical listing for each of these categories as discussed in the section for returned devices.

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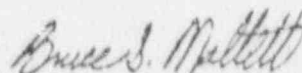
On the cover letter for the monthly report, 3M will provide a summary of the following:

- a. The total number of devices unreturned
- b. The total number of unreturned devices in each of the 3 categories listed above.

3M will provide the information described above in a written report to the NRC on a monthly basis. The information will either be cumulative or in addition to that submitted in a previous monthly report.

In response to the conference, 3M agreed to submit a summary of the type of information agreed upon to the NRC for review prior to implementing.

The type of information requested from 3M in its future reports includes input from Pat Vacca, NMSS.



Bruce S. Mallett, Chief
Nuclear Materials Safety
Branch

cc:

F. Vacca, NMSS
J. Joyner, RI
W. Cline, RII
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