

**DOW CORNING**

RED/DCB

January 25, 1991

United States Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Attention: Mr. Roy J. Caniano, Chief  
Nuclear Materials Safety Section 2

Reference: Licenses No. 21-08362-05,08,09,12, and 13

Dear Mr. Caniano:

This letter is response to your letter dated December 28, 1990. We have reviewed the items contained in the notice of violation and have taken the following corrective actions in regard to these items.

License No. 21-08362-05

1. A license amendment is being prepared and will be submitted prior to January 30, 1991 which will amend license condition no. 11 to state that licensed material will be stored under the supervision of Kevin Glenna and/or Ernest Sutton. Both individuals have previously received training to meet the NRC requirements.

License No. 21-08362-08

2. Unfortunately, room 138 has been modified for use as an office. A license amendment will be submitted no later than January 30, 1991 to modify this condition in the license to reflect the correct room used for storage.
3. Since the NRC visit, procedures in the building have been modified to assure that this license condition will be met.

License No. 21-08362-09

4. A license amendment is being prepared and will be submitted prior to January 30, 1991 which will amend license condition no. 19 to state that licensed material will be stored under the supervision of Ron Robinson and that Kevin Glenna will be the Radiation Safety Officer. Both individuals have previously received training to meet the NRC requirements.

License No. 21-08362-13

5. A license amendment is being prepared and will be submitted prior to January 30, 1991 which will amend license condition no. 12 to state that Kevin Glenna will be

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the Radiation Safety Officer. Mr. Glenna has previously received training to meet the NRC requirements.

For all of the situations listed above, the corporate radiation hazards committee has committed to audit each license annually to assure that all provisions of the license are met. In fact, the 1990 audit has already been held and corrective actions as noted in that audit will be taken. Basically these problems were the same as noted above and the corrective action is as noted.

In addition to the above items, you noted in your letter concern that an individual who is involved with the transfer of the irradiator cobalt-60 sources for license 21-08362-13 did not appear to be adequately trained in basic radiation safety principles and radiation survey instrumentation. The following information is in answer to this concern.

Two employees are assigned to remove the cobalt-60 pencils from the transfer cask, wipe test the pencils, and return the pencils to the transfer cask. One of these individuals has been doing this procedure for over 20 years and is very knowledgeable about basic radiation safety principles and radiation survey instrumentation. The second individual has been doing this task for only the past two years. He has always worked under the direct supervision of the first, more experienced employee when handling radiation sources. He did receive a 40 hour training course at an outside facility. This is the person the NRC compliance officer talked with. It appears that he has not retained all of the information that he received at the time of the training and in regular training classes held since then. As a result, he has been removed from being in responsible charge of this activity and his name will be removed from all documents relating to this activity.

Each time that servicing of the source is required (once per year), the site Radiation Safety Officer meets with all members of the team who work on the project and reviews basic radiation safety principles and the use of radiation survey instruments. He also reviews all of the specific hazards and concerns related to the actual servicing which will take place at that time. In addition, the RSO is present during the actual transfer of the sources which are in a lead transfer cask to and from the cave where the wipe tests take place. The employee that the NRC talked with is not involved with nor has he ever been involved with this part of the servicing of this source.

Each person who supervises the transferring of the source and the wipe testing of the source has received at least 40 hours of basic radiation safety training including radiation survey instrumentation at an outside school. In the future, all such persons will attend the Radiation Safety Specialist program at Oklahoma State University Extension program or equivalent acceptable to the NRC.

We anticipate that this explanation will meet with the approval of the NRC. We will assure that only properly trained individuals are working with this source and that all supervision including the RSO. We would appreciate it if you would let us know if this is acceptable so that we can proceed with the servicing of this source in May of 1991.

Very truly yours,

  


Frederic Oonk  
Midland Site Manager