

HAMILTON WATCH CO., INC.

LANCASTER, PENNSYLVANIA 17604 U.S.A. (717) 394-7161

July 11, 1985

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

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License No. 37-03572-06
Docket No. 030-12704
Control No. 103666

Dear Dr. L. F. Friedman,

The following memo contains responses to your questions sent to me in your letter of June 24, 1985. All responses are in reference to amend License No. 37-03572-06 which was dated April 10, 1985.

Item 1 - Radiation Safety Course

At the time of our application, Mr. D. M. Fenwick was acting as our Radiation Safety Officer. Due to reorganization of our technical staff, Mr. Fenwick will no longer serve in this capacity as of September 1, 1985.

His replacement is Mr. J. C. Sabol. Mr. Sabol will be attending a Radiation Protection course in August of this year at Harvard University. I have enclosed the form letter sent to Harvard University School of Public Health and Safety which was used to enroll Mr. Sabol.

Item 2 - Training Program

We have developed a memo which is posted on all bulletin boards in our Tritium Room area which lists procedures and precautions for contamination. All employees who enter this area are briefed by Mr. Fenwick before starting their new assignments. Please note that Mr. Fenwick takes care of all maintenance requirements in the area. We use the internal operators as janitorial staff at the close of each day and during off working hours, the room is secured until working hours resume.

I have enclosed this memo for your review.

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Item 3 - Facility Description

I have enclosed a copy of our tritium room layout for your review.

This area is secured during off working hours for no one's admittance. The following signs are posted on the entrance door:

"Caution Radioactive Materials"

"Authorized Employees Only"

The following is a list of employees who are allowed access to this area:

1. Mr. D. M. Fenwick
2. Mr. J. C. Sabol
3. Mr. T. E. Deitzler
4. Mr. C. Link
5. Ms. I. White
6. Ms. P. Heine

Our activity has been reduced drastically since the original application was filed. Activity at the present time is very minimal and is for servicing work only in this area.

Modules are repaired under exhaust hoods which have an air flow of 200 cubic feet per inch. Discharge is to the atmosphere with no return permitted. We store the modules in a cabinet which has an exhaust air flow of 200 cubic feet per inch. The discharge is to the atmosphere with no return permitted.

A bioassay program has been established. While it is highly impossible that any employee working in the area will receive more than the maximum permissible amount, we still insist on a quarterly bioassay. These urine samples are sent to the following address for analysis:

Self-Powered Lighting, Inc.
8 Westchester Plaza
Elmsford, NY 10523

As employees are trained for the servicing of these watches, Mr. D. Fenwick gives them the necessary instructions for access to the tritium room. Over the past two and one half years we have not needed to add additional personnel, in fact, we have reduced manpower by two operators.

Item 4 - Servicing Procedure

The Radiation Protection Program is based on the use of a Tritium Air Monitor (Betacec Model 20). The monitor is calibrated on a frequency of once per month by Mr. D. Fenwick. Each year during our summer factory shutdown, it is sent to Overhoff and Associates of Cincinnati, Ohio for servicing and recalibration. Each time the alarm is set off, we recalibrate and record readings. Daily records are kept of the monitoring.

The following specifications are used in this area:

Minimum scale: 0 to 10 $\mu\text{Ci}/\text{M}^3$ with gamma compensation.

Accuracy: 10% of full scale.

Reproductibility: (+) (-) 2%

Capacity: 10 Liter

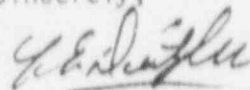
Time Constant: 15 seconds - 45 seconds

The monitor is equipped with a strip recorder which air records are based from. The sensitivity of this equipment is 1 $\mu\text{Ci}/\text{M}^3$ of Tritium.

If the alarm is triggered, we have employees respond to safety officers who follow through to the complete body wash and bioassay test sent for analysis.

If you have any questions to the information I have enclosed, please call me to discuss. Thank you once again for the cooperation your staff has given me in the refiling for this amendment to License No. 37-03572-06.

Sincerely,



Thomas E. Deitzler
Director of Operations

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TED/jap