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November 19, 1990

John D. Kinneman, Chief
Nuclear Materials Safety Section B
Division of Radiation Safety and Safeguards
United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Kinneman:

Re: Docket No. 030-14895
License No. 29-18345-01

This letter is in response to the above referenced
Notice of Violation dated October 23, 1990.

Pursuant to the provisions of 10 CFR 2.201, the
following outlines the steps that have been taken to correct
the above referenced violations issued as a result of the
routine inspection conducted on July 20 to September 17,
1990:

- A. Condition 12 of License No. 29-18345-01 requires that
licensed material be possessed and used in accordance
with the statements, representations, and procedures
contained in a letter dated January 17, 1985, enclosed
with a letter dated February 25, 1985, and an
application dated March 26, 1984.

VIOLATION

1. Item 11. of this application requires that survey
instruments be calibrated quarterly.

Contrary to the above, since April 1988, the Eberline
E-120 G. M. survey instrument has not been calibrated
quarterly. The instrument was calibrated during the
second and third quarters of 1988, the first quarter
of 1989, and during the first and third quarters of
1990.

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1. Continued

RESPONSE

Platina recognizes that the instrument was not calibrated during each quarter of the period. However, the instrument was calibrated at all times while licensed material was present at the facility. It was our understanding at the time that it was not necessary to have the instrument calibrated while there was no licensed material at the facility. In the future, the instrument will be calibrated quarterly irrespective to whether licensed material is present at the facility. This action has been implemented.

VIOLATION

2. Attachment D to this application requires that urine samples be taken from the radiation workers on a semi-annual frequency for gross alpha and beta analysis.

Contrary to the above, since April 1988, urinalyses have not been performed semi-annually. Urinalysis were performed only during October 1988 and December 1989.

RESPONSE

Urinalysis were performed semi-annually as required by our license. However, at the time of the inspection, the results of the urinalyses had not been returned to us by the testing laboratory and therefore were not on file at the facility for inspection. In the future, forwarding of the test results to us will be expedited by the testing laboratory. Copies of the test results will be maintained on site and will be available for review. The necessary action required to this end has been implemented.

VIOLATION

3. Attachment D to this application requires that general health physics surveys be performed quarterly by Teledyne Isotopes, Inc.

3. Continued

The surveys are to include direct and removable radiation monitoring with an Eberline PAC-4G gas proportional survey meter and an E-120 G.M. Survey Instrument. Section 3. of the letter dated January 17, 1985, requires that records of radiation monitoring be retained.

Contrary to the above, from 1988 through the first quarter of 1990, the quarterly Health Physics Survey Reports from Teledyne Isotopes, Inc., did not include a record of the results of direct monitoring for fixed contamination measured with the E-120 G. M. instrument.

RESPONSE

Health physics surveys were performed as required by attachment D of the application by Teledyne Isotopes, Inc. Due to an administrative oversight, the reports sent to Platina did not include a record of the results of direct monitoring for contamination measured with the E-120 G. M. instrument. Copies of record of results for the period from 1988 through the first quarter of 1990 have subsequently been forwarded to Platina by Teledyne Isotopes, Inc. and are on file for review. Additionally, copies have been forwarded to the NRC. All future quarterly Health Physics Survey Reports from Teledyne Isotopes, Inc., will include a record of the results of direct monitoring for fixed contamination measured with the E-120 G. M. instrument.

B. VIOLATION

10 CFR 30.41(c) requires that prior to transferring licensed material each licensee shall verify that the transferee's license authorizes the receipt of the type, form, and quantity of byproduct material to be transferred. 10 CFR 30.41(d) specifies the requirements for verifying authorization.

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B. Continued

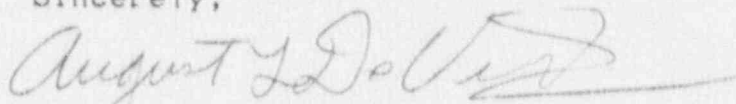
Contrary to the above, as of September 6, 1990, the licensee did not have a copy of Teledyne Isotopes, Inc., license to verify their authorization to receive licensed material transferred from Platina Laboratories, Inc. between March 1988 and March 1989.

RESPONSE

Platina Laboratories, Inc., has obtained a copy of the license for the period between March 1988 and March 1989 and has verified that they were authorized to receive licensed material from Platina Laboratories, Inc., during that period. Furthermore, Platina Laboratories, Inc., will maintain a copy of the Teledyne Isotopes, Inc., license to verify future shipments of Licensed material between Platina Laboratories, Inc. and Teledyne Isotopes, Inc.

We trust that the above responses adequately address all the violations in the above referenced notice of violation. Please be advised that full compliance has been achieved effective this date. If you have any further question or concerns, please feel free to contact me or Dr. Len Spaulding, the Radiation Safety Officer.

Sincerely,



August L. De Vico II, REP, CHMM
Manager of Environmental and
Regulatory Affairs

ALD/pc

cc: L. Spaulding
Radiation Safety Officer

R. Kettler