

DEC 21 1994

Docket No. 030-20709

License No. 20-20675-01

Eurotherm Gauging Systems, Inc.  
ATTN: Richard F. Murphy, Vice President  
Radiation Safety Officer  
900 Middlesex Turnpike  
Billerica, MA 01821

SUBJECT: ROUTINE INSPECTION NO. 030-20709/94-001

Dear Mr. Murphy:

This letter refers to your November 22, 1994 correspondence, in response to our October 27, 1994 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

No reply to this letter is required. Thank you for your cooperation in this matter.

Sincerely,

Original Signed By:  
Elizabeth Ullrich

*for*

Mohamed M. Shanbaky, Chief  
Research and Development Section  
Division of Radiation Safety  
and Safeguards

Docket No. 030-20709  
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U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

November 22, 1994

Dear Sir:

Attached is our response to your Notice of Violation Docket No. 030-20709. I believe that it is totally responsive to your notice and that the corrective actions outlined will bring Eurotherm Gauging Systems Inc. into total compliance with NRC requirements.

Please contact me if there are any questions.

Sincerely,

Richard F. Murphy  
Vice President / Radiation Safety Officer

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Reply to a Notice of Violation

Docket No. 030-20709  
License No. 20-20675-01

Violation

Dose rate measurements were not being made at the package surface of radioactive sealed sources coming into the facility.

1. Reason for the violation

This was an oversight in the procedures we have in place for receiving radioactive sealed sources into our facility. Dose rate measurements are routinely taken of the contents of all radioactive sealed source packages. The oversight was in not taking measurements of the main package.

2. Corrective steps that have been taken and the results achieved

A procedure has been generated for the receipt of radioactive sealed source packages (attached) that includes the requirement for package surface measurements. The sealed Source Package Receipt Log (attached) includes columns for recording the date and name of the person who performs the required surface measurements.

3. Corrective steps that have been taken to avoid further violations

This procedure has been discussed with the Receiving Department Supervisor. He fully understands all requirements of the procedure. The Radiation Safety Officer will routinely monitor the Sealed Source Package Receipt Log on a monthly basis to confirm that the surfaces of all radioactive sealed source packages coming into the facility are being properly monitored.

4. Date when full compliance will be achieved

Full compliance will be achieved as of December 9, 1994. All radioactive sealed source packages received into the facility as of this date will have the package surfaces monitored and logged in the Sealed Source Package Receipt Log.

## Procedure For Receipt Of Radioactive Sealed Source Packages

All radioactive sealed sources received at Eurotherm Gauging Systems will undergo the following check-in procedure on the shipping dock within three hours of receipt of delivery:

1. Dose rate measurements will be made at the package surface and at one meter. The limits for dose rates will be 200 mr/hr at the surface and 10.0 mr/hr at one meter.

2. A wipe test survey for removable contaminations will be performed on the external surfaces of the package. A Source Wipe will be rubbed across a 300 square centimeter area of the package surface. The Source Wipe will then be read for radioactive contamination. Results of this test must be less than 22 dpm per square centimeter.

3. The package receipt will be entered into the Radioactive Sealed Source Package Log being kept for all radioactive sealed sources coming into the facility. The name of the person performing the package surface measurements and the date the measurements are performed will be recorded in this log.

4. Radioactive sources will only be accepted during normal working hours. No sources will be accepted after hours or on weekends. Vendors will be instructed to notify Eurotherm Gauging Systems receiving one day prior to making a shipment.

5. The check-in procedure will be implemented by a person in the Receiving Dept. who has been trained in the implementation of this procedure. In the event that the person who would normally implement the procedure is not available, the procedure will be implemented by the Radiation Safety Officer (Richard Murphy) or his designee (Daniel Kelleher).

Any packages that do not comply with the above check in criteria will be stored until arrangements can be made to return the package to the manufacturer. The Radiation Safety Officer will be notified that the package is not in compliance and he will make the arrangements to have the package returned to the vendor.

10/31/1994

