



TRACER PROFILES, INC.

BETALOG PROFILES, INC.

"Fluid Movement Specialist"

4071 N.W. 3rd ■ Oklahoma City, Okla. 73107

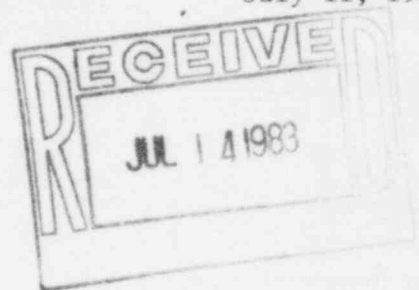
(405) 946-1241

July 11, 1983

U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Re: NRC License 35-21272-01

03020132



Gentlemen:

Pursuant to your letter regarding the inspection conducted by Mr. R. C. Brown on May 4, 1983, we respond as follows:

Please be advised that the possession limits violation cited was brought about by unusual circumstances of which Mr. Glen Brown of your Region IV office was appraised at the time. To recap the situation, during the latter part of January 1983 there was a powerplay for ownership of Betalog, Inc. (License 35-21058-01). The primary investor, George Hahn, did not follow through with issuance of stock to the other owners, myself (Jack Carter) and James M. Gibson. Because of this, Mr. Gibson and I formed another company called Batalog Profiles, Inc. and on February 1, 1983, submitted a license application under this name. This was coordinated through Mr. Paul Guinn of the NRC licensing branch in Washington D.C., and considering the circumstances, he expedited the issuance of License 35-21272-01 on February 8, 1983. In the meantime, we continued to operate as Betalog, Inc. and on February 4th ordered the 200 mCi mentioned in the citation. This isotope was ordered under Betalog, Inc.'s license which authorized possession of a maximum of 250 mCi of Iodine 131. About this same time, Mr. Hahn expelled us from the facility, and because we were the only authorized persons on the license, we kept possession of the unused isotope and the records of its receipt feeling this was our moral responsibility in the best interest of health physics. The records were subsequently found in our files by your inspector.

Mr. Hahn tried to use the radioactive material license and the NRC as a leverage point against us and made every effort to harass us and prevent us from continuing in business. He called your regional office and the licensing division in Washington trying to prevent or delay issuance of our license. Although the license was issued as applied for in the name of Batalog Profiles, Inc., he did succeed in getting a court order preventing us from using that name. We amended our license to change the name to Tracer Profiles, Inc. which is the name we are presently operating under.

In conclusion, I would like to point out that Keith Moon of Support Consultants and Associates, Inc. assisted us in resolving the situation because of his expertise in working with the regulatory agencies. He made telephone calls on our behalf to Mr. Glen Brown to inform him of the unusual circumstances and to advise of the proceedings and to make him aware of the harassment of Mr. Hahn. Mr. Moon also

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prepared our license application and advised Mr. Guinn of the problems with Mr. Hahn. Mr. Moon will verify the information given in this letter as he was in full knowledge of what was going on during this entire episode. He advises that 10 CFR provides for flexibility within the guidelines when there are extenuating circumstances and that these circumstances were conveyed to the proper NRC administrative personnel. We stand on that in relationship to this violation, as we feel we did not violate the possession limits and did the correct thing in regard to maintaining the receipt records which caused the confusion leading to this citation.

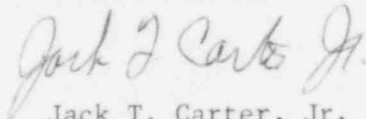
With regard to items 1, 2, and 3 on the Notice of Violation:

1. This letter gives corrective steps taken.
2. We will not exceed the maximum amount of isotope authorized by our license. To meet future demands, we have ordered another truck and are submitting an amendment request to increase the maximum possession to 200 mCi (100 mCi per truck) and adding two additional radiation handlers.
3. We believe that we are in full compliance at this time.

If you need additional information or clarification, please do not hesitate to contact me.

Sincerely,

TRACER PROFILES, INC.



Jack T. Carter, Jr.
Vice President and
Radiation Protection Officer

pm

cc: SC&A Inc.