HOCHIKI

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U.S. Nuclear Regulatory Commission
Document Control Desk
Washington D.C. 20555

Reference: Docket # 030-08210, License 04-14886-01E
Reply to a notice of violation (Supplementary Information)

December 27, 1994

Dear Sirs,

The attached documents are supplements to the reply of the Notice of Violation letter, which was received on November 23, 1994. The original reply was sent to your people on December 5, 1994. Since then we were informed by Mr. David Skov of the Region IV Field Office in Walnut Creek, CA that additional information was required. If the contents are still not sufficient please feel free to contact myself or our Radiation Safety Officer, Gyo Shinozaki at the phone number indicated above.

Sincerely,

Hiroshi "Sy" Saito
Executive Vice President

Copies to: U.S. Nuclear Regulatory Commission Region IV
Regional Administrator
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011

U.S. Nuclear Regulatory Commission Region IV
Walnut Creek Field Office
1450 Maria Lane
Walnut Creek, California 94596

Gyo Shinozaki - Hochiki America
Loren Leimer - Hochiki America

IE07

REPLY TO A NOTICE OF VIOLATION

(Supplementary Information in ***bold italics***)

Violation 1-C

Reason for occurrence: Our application documents and subsequent correspondence has caused our license requirements to become somewhat disjointed. This has led to many misunderstandings as to what exactly Hochiki America has committed to doing as it relates to this issue.

Corrective steps taken: Hochiki America has submitted brand new application documents that are to supersede any correspondence that has taken place in the past. Within the documents are our quality control procedure describing our requirements as it relates to this issue. ***There are statements within the application documents on page 5 that state the following: "...the inner container is smear tested and the results recorded." and " A minimum of 1% of the daily production of ionization chambers, randomly selected, will be wiped. The results will be recorded."***

Corrective steps taken to avoid further violations: The aforementioned internal audits will monitor any deviations from license requirements.

Date when full compliance will be achieved: The application documents were submitted on November 11, 1994. Full compliance will be insured during the aforementioned audits.

Violation 3

Reason for occurrence: Hochiki America had failed to include model number differences within our application documents. ***Thus there was no way to identify the manufacturer as Hochiki America through our labelling.*** Though the device itself was mechanically the same as the device originally submitted, the different model names were not correctly reported.

Corrective steps taken: As stated earlier, Hochiki America has re-submitted application documents. Contained in these documents is a model number identification matrix that indicates the various models that exist within the device series. ***This will allow for traceability back to Hochiki America of any device we manufacture that contains radioactive materials. Traceability will be possible through this matrix regardless of what the label indicates. This can be done through our license number which does appear on all of our product labels.***

Corrective steps taken to avoid further violations: Our radiation safety personnel have been instructed to amend our license any time we add a new model name to our device listing. In addition the aforementioned audits will identify any products not properly listed.

Date when full compliance will be achieved: This is dependent upon when NRC approves our license application. ***Refer to the attached copy of facsimile from your Washington D.C. headquarters.***