

UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

MAR 17 1975

Gamma Diagnostic Laboratories
Attention: Mr. R. C. Ferris
President
P.O. Box 1349
Attleboro Falls, Massachusetts 02763

License No. 20-15215-01

Reference: Your letter dated March 5, 1975
In response to our letter dated February 4, 1975

Gentlemen:

Thank you for informing us of the corrective and preventive actions you documented in response to our correspondence. These actions will be examined during a subsequent inspection of your licensed program.

On March 12, 1975, Mr. McClintock of this office discussed your response with you by telephone. From this conversation it is our understanding that the first formal meeting of the Radiation Safety Committee will be on March 17, 1975 and this meeting will be concerned with the role of the Committee. The second formal meeting is scheduled for April 21, 1975 and the agenda for this meeting will include exposure control and the principle of maintaining exposure as low as practicable. We also understand that you plan to document these meetings in a letter to be submitted to this office on or before May 1, 1975. If our understanding is incorrect, please notify us immediately.

Your cooperation with us is appreciated.

Sincerely,

James P. O'Reilly
Director

bcc:
IE Chief, FS&EB
IE:HQ (4)
L:D/D for Fuels and Mat'l
PDR
NSIC
IE Files
DR Central Files
State of Massachusetts

OFFICE	GRESS				
SURNAME	Jerman/lc	McClintock	Nelson	O'Reilly	
DATE	3/13/75	3/13/75	3/14/75		



GAMMA DIAGNOSTIC LABORATORIES

P. O. BOX 1349

ATTLEBORO FALLS, MASSACHUSETTS 02763

5 March 75

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. O'Reilly:

In response to your letter dated 4 February 75 in which there are questions regarding the inspection of this facility on 22 January 75 by Mr. Jerman of your office, the following comments are made:

1. With respect to item 1, we have completed a Form AEC-4 on both individuals in question. In the case of one individual, we have had to make assumptions of exposure for certain periods of his occupational history, in that we have not had success in obtaining his past exposure records to date. These assumptions are in accordance with 10 CFR 20.102c.

Administratively, no person will be allowed any laboratory involvement with any radioactive material prior to the completion of a Form AEC-4. In the event that a time lag occurs in obtaining a previous radiation exposure history, we shall maintain dose limits specified in 10 CFR 20.101a.

2. With respect to item 2, we have attached the report letter to the Commission that explains the circumstances surrounding these over-exposures as well as a description of the corrective action taken and the results to date of such actions.
3. With respect to item 3, the attached letter to the Commission is submitted in accordance with

10CFR 20.405. In addition, the individuals involved have also been given a copy of the aforementioned letter.

4. With respect to item 4, we believe that there may have been a misunderstanding concerning the matter of surveys in unrestricted areas.

We have in the past and currently continue to make surveys of unrestricted areas in accordance with 10 CFR 20.201b. However, there was some confusion that occurred during a particular time period in which two monitor points that at one time were considered to represent unrestricted dose rates, became monitor points of a controlled area due to additional construction on our facility. To add to this confusion, this survey data was inadvertently recorded on forms that indicated "Restricted Area Surveys" which made it appear that this particular technique of monitoring had not occurred in unrestricted areas.

We monitor restricted, controlled, and unrestricted areas for radiation levels in two ways: (1) continuous monitoring by the use of film badges, and (2) monitoring by the use of a radiation detection instrument with attached G-M tube.

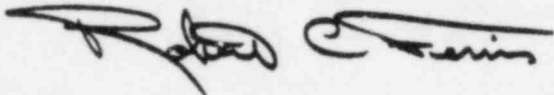
We have redesigned our forms used for the maintenance of these survey records in order that they reflect the survey data with less confusion.

5. With respect to item 5, we have posted the attached notice along with 10 CFR 19 and 20, a copy of our byproduct materials license, and a copy of our Radiation Safety Manual.

In addition to the aforementioned corrective actions, we have organized a Radiation Safety Committee. The Committee will consist of the following personnel: an outside consultant expert in radiation safety, our regulatory affairs administrator, our production manager, and the writer. The Committee tentatively will meet on the third Monday of every month at twelve noon in order to review and make recommendations on any and all activities conducted under our license.

If I can be of further service in any way, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert C. Ferris", with a stylized flourish at the end.

Robert C. Ferris
Gamma Diagnostic Laboratories, Inc.

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RCF/pas

NOTICE

Pursuant to Title 10 Code of Federal Regulations Part 19, correspondence between Gamma Diagnostic Laboratories and the Nuclear Regulatory Commission concerning activities authorized by our license are available for inspection by any employee engaged in licensed activities in my office.

A handwritten signature in dark ink, appearing to read "Robert C. Ferris", with a long horizontal flourish extending to the right.

ROBERT C. FERRIS