

April 6, 1995

CAL No. 1-95-006

Mr. William M. McDaniel
Burlington Site Manager
Amersham Corporation
40 North Avenue
Burlington, MA 01803

SUBJECT: CONFIRMATORY ACTION LETTER

Dear Mr. McDaniel:

During the Nuclear Regulatory Commission inspection of your facility on March 29, 1995, several potential safety concerns were identified. These concerns involved the adequacy of the existing radiological and engineering controls to limit hot particle skin contamination incidents at your facility. In addition to the contamination event that prompted this NRC Inspection, numerous incidents of hot particle contamination to personnel had occurred during the past few years, many of which posed a significant potential for a skin dose above the regulatory limits. Further, as discussed with you during the inspection, the NRC has identified concerns regarding the accuracy of your assessments of skin dose resulting from these contaminations.

Pursuant to a telephone conversation between you and other members of your staff and Dr. Mohamed Shanbaky, Chief, Research and Development Section, NRC, on April 4, 1995, it is our understanding that you have taken or will take the following actions with regard to your licensed activities:

1. Develop and implement procedures for frisking-out from potentially hot particle contaminated areas that include a complete frisk of the entire body. Teams of two personnel or a health physics technician to aid in frisking inaccessible areas, such as the back, will be used to monitor personnel at hot particle area egress points. This action will be implemented immediately. The written procedure for the augmented frisking-out activities will be completed and submitted to the NRC Region I office by May 1, 1995.
2. Develop a radiation detection system that will be used to survey all protective clothing after each use. The re-use of tyvek protective clothing will immediately be terminated until this system is in use. This system will be operational by April 10, 1995 with written procedures in place by May 1, 1995.
3. Provide formal re-training on the use of protective clothing and especially on good practices to remove protective clothing when leaving contaminated areas. This training program will be completed by April 24, 1995.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Sincerely,

Original Signed By

Charles W. Hehl, Director
Division of Radiation Safety
and Safeguards

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4. * Decontaminate the unloading hot cell and institute a program of routine decontamination to maintain the cell in as clean a condition as possible. An action plan including cell decontamination procedures, and dates and frequencies of decontamination will be submitted to the NRC Region I office by June 1, 1995.
5. Reassess the doses resulting from hot particle contamination incidents that occurred starting in 1991 to the present to include the effects of resolving time losses of the instruments used to estimate particle activity. Any other dose adjustments that may improve the accuracy of the dose estimates should also be included. This action for the March 24, 1995 incident will be completed and the results submitted to the NRC Region I office by April 12, 1995. All other hot particle skin contamination dose reassessments will be completed and the results submitted to the NRC Region I office by June 1, 1995.

Long term goals for hot particle radiological controls including additional engineering controls, hot particle dose assessment procedures, hot particle detection systems, and process modifications will be discussed during a future meeting with the NRC Region I office.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, you are required to:

1. Notify me immediately if your understanding differs from that set forth above;
2. Notify me if for any reason you cannot complete the actions within the specified schedule and advise me in writing of your modified schedule in advance of the change.
3. Notify me in writing when you have completed all of the actions addressed in this Confirmatory Action Letter; and

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on the part of the licensee; nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.