

GAMMA CORPORATION

RECEIVED MRC

649 California Ave., Suite 102 • P.O. Box 430 Wahiawa, Hawaii 96786 • Phone (808) 621-8892

1984 JUL 16 AM 11: 01

REGION VILLE

July 6, 1984

R. A. Scarano, Director Division of Radiological Safety and Safeguards Program U.S. Nuclear Regulatory Commission Region V 1450 Maria Lane, Suite 210 Walnut Creek, CA 94596

Dear Mr. Scarano:

This letter is in response to your letter of June 13, 1984 concerning a routine safety inspection conducted by Mr. J.F. Pang of our license number 53-16847-01.

We were surprised and equally troubled by the number of violations identified during the routine inspection. We have concluded that such violations were allowed to occur partly through lack of personnel time to perform some of the required activities and partly through the lack of a formal audit program of license activities. Assumption had been made that for a license of this size, a formal audit program was unnecessary. This inspection has shown this assumption to be false.

Consequently, we have hired additional personnel to insure that all required license activities are performed on time. In addition, we have established a formal audit requirement for all licensed activities on an annual basis.

The rest of this letter deals with specific actions taken on the specific violations identified. Paragraph numbers of our response correspond to the paragraph numbers of the Notice of Violation:

A. An assumption had been made because of an ambiguity in our license application that instrument calibrations could be performed on an annual basis. A license amendment has been submitted to specify that calibration of survey instruments will be performed on an annual basis. In the meantime, instrument calibrations are being performed on a semi-annual basis. Full compliance is now in effect.

- B. The 50 mCi americium-241 source has been leak tested. All other sources have been leak tested within the required six months period. Full compliance is now in effect.
- C. The required inventory has been conducted. A tickler for the six months inventory has been established. Full compliance is now in effect.

Sincerely,

GAMMA CORPORATION

Philip J. Manly

Certified Health Physicist