

# ATOMIC DISPOSAL CO., INC.

P O BOX 35 • TINLEY PARK, ILLINOIS 60477 • 312-429-1660

USNRC LICENSE NO 12 11286-1

October 9, 1980

Mr. Victor Stello, Jr.  
Director  
Office of Inspection and Enforcement  
U S N R C  
Washington, D. C. 20555

PRINCIPAL STAFF			
DIR		SAFE	
D/D		ADM	
A/D		PAO	
✓ FF&MS		SLO	
RC&ES			
PD&NS		FILE	✓

Dear Mr. Stello:

This is in response to your "Notice of Violation" dated September 17, 1980, and Mr. Keppler's letter of September 26, 1980, also pertaining to this same matter.

In reviewing the above mentioned notice, we offer the following defense in response to item Number 1:

Some time ago, during a combined D.O.T. and N.R.C. inspection of our facility (carried out by respective members of each organization), we quizzed the U.S. DOT inspector about the blocking of full trailerloads of drums. He informed us that if a trailer was fully loaded - as this one was, the walls and doors acted as bracing and prevented the shifting and possible leaking of lading under conditions normally incident to transportation. (We added blocking on our own to be safe).

Based on this information, and as this was a full load and no problems resulted in the transportation of the material, we feel that this Notice of Violation and Civil penalty is totally unjustified.

With reference to the leaking of liquid from the container when it fell over, we can only reiterate what we have stated repeatedly; when a container of vials packed in any absorbent is subjected to constant road vibration for 2,000 miles, the absorbent will separate and migrate to the bottom portion of the drum. The vials at the top will break if subjected to a substantial shock, such as a fall, and as toluene rapidly dissolves a plastic bag shortly after packaging, it is virtually useless as an inner containment vessel. When free-flowing liquid comes into contact with a lid of an overturned drum, as would have happened in this case, unless the lid has been seated perfect and the rubber gasket is entirely intact and not twisted in any way, a very thin liquid such as toluene will leak out.

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SAL FOR BY-PRODUCT, SOURCE, AND SPECIAL NUCLEAR MATERIALS

E/100

October 9, 1980

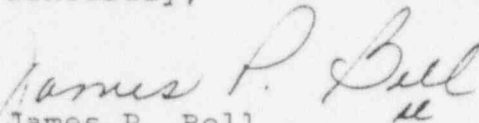
Please keep in mind that although we tighten every lid ring with an electric impact wrench, the road vibration experienced on a 2,000 mile journey can cause bolts to loosen and lids to become unseated.

Since the time of this purported violation, we have instituted the following procedures:

1. Every container is now personally inspected by myself or our Operations Manager, Mr. Robert Bassett.
2. Loads are now blocked with 2x4's nailed to the floor and walls of the trailer.
3. We are researching a locking device which can be clamped or otherwise attached to the bolt after tightening to prevent it from vibrating loose.

Our action has already prevented additional problems of this type from developing and we feel that no problems of this type will be evidenced in the future.

Sincerely,

  
James P. Bell  
President

JPB/se

✓ cc: Mr. James G. Keppler  
Director  
Region III