

MAY 23 1974

L:MB:NB
(43639)

The Dow Chemical Company
ATTN: Mr. H. R. Hoyle, Chairman
Radiation Safety Committee
Industrial Hygiene
1707 Building
Midland, Michigan 48640

Gentlemen:

This refers to your letter dated May 6, 1974, with which you submitted revised information concerning your application for renewal of License No. 21-00265-04.

With respect to the organization and management control of your program, we need the following information.

1. A statement of the specific duties and responsibilities of Mr. Harry R. Field.
2. A description of the on-the-job audits which will be performed to determine that radiography personnel are complying with your procedures, AEC regulations, and the terms and conditions of your license. We need to know by whom the on-the-job audits will be conducted. We require that such audits be performed at quarterly intervals.
3. We need a copy of the calibration procedure followed by the Dow Industrial Hygiene laboratory for your instruments.
4. There is no information concerning source exchange. We need to know by whom the source exchange will be performed and we need a copy of the procedures for source exchange.
5. There is no information concerning quarterly inspection and preventive maintenance of equipment. We need to know by whom the quarterly inspection and preventive maintenance will be performed and we need a copy of the specific procedures which will be followed for maintenance of equipment.

With respect to training, we need to know by whom instruction will be performed in the formal aspects of training. The name of each person who is an instructor should be submitted together with a statement of his qualifications to conduct training.

OFFICE						
SURNAME						
DATE						

8507290392 850529
PDR FOIA
KOHNB5-256 PDR

We note in Section A.1. that competence to act as a radiographer's assistant will be conducted by a radiographer. We consider training to be a management function and all determinations of competence of individuals should be done by management personnel.

With respect to your operating and emergency procedures, we have the following comments.

1. There is no instruction concerning the need for frequent reading of dosimeters during the day's work nor is there an instruction concerning immediate steps which must be taken in the event a dosimeter is found off-scale.
2. Section A.8 does not specify the maximum radiation level in the passenger compartment of the vehicle. We note that there is a specification in the Form. However, the radiation level should be in the instructions.
3. The emergency procedures contain great deal of descriptive information and information relating to duties of persons other than radiography personnel. Instructions to personnel should not contain information which is not specific to the duties and responsibilities of radiography personnel.
4. Section II.B.2.d of the emergency procedure indicates that in the event that the source is lost, it should be located and should be replaced if it can be done with less than 1000 mrem exposure to a radiographer. We need to know the rationale for what appears to be unnecessary exposure to personnel. Further, if radiography personnel will attempt to replace sources, specific instructions for the performance of this function should be in the operating and emergency procedures. We also need to know what specific instructions and training will be given to persons during the course of their training in performing procedures such as replacing sources in the exposure device. Similarly, the 1000 mrem specifications in Section II.B.4.d. should be justified.

We shall continue review of your application upon receipt of your revised procedures and the other information requested above.

Sincerely,

ORIGINAL SIGNED BY
NATHAN BASSIN

St.Br.Dist.
RO:III

Nathan Bassin
Materials Branch
Directorate of Licensing

E/W Cress OFFICE	MC#269254	5/29/74	DATE						