



Mr. A. Bill Beach
Regional Administrator, Region III
United States Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

September 25, 1996

Re: CAL No. RIII-96-011
Confirmatory Action Letter

Dear Mr. Beach:

This will confirm receipt of your letter of August 19, 1996, which refers to the recent inspection of our facilities by Mr. Darrel Wiedeman and the ensuing events, which need not be repeated in this letter. It will also confirm, with thanks, your letter of September 18, 1996, extending the date of submitting a written response to September 26, 1996.

In the interest of simplicity and clarity, I wish to advise you that I believe that I have, to the best of my ability, undertaken the required actions in order to correct errors that we may have inadvertently made, and taken steps to avoid recurrence.

In particular:

1. I have reviewed NRC regulatory requirements regarding the manufacture and/or distribution of "license exempt" products.
2. We have developed a set of written procedures, copy enclosed, for the production of "license exempt" tritium calibrators, to ensure that NRC requirements are met. This is intended to ensure that our staff will automatically follow requirements.
3. A written procedure for management audits has been created to ensure that possession limits of Kr85 sealed sources will not exceed the limits specified in the license no. 34-18214-01.
4. We have reviewed past transfer (sales) records for the period of time covering tritium gas calibrators with serial numbers 1919 and 1939, and have unequivocally determined that no other tritium gas calibrators were distributed. As evidence, I enclose a copy of our serial number log sheet which will show you that the serial numbers associated with our products are consecutively selected in a chronological fashion, irrespective of the item. We **DO NOT** assign product dedicated serial numbers.

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PDR ADOCK 03033371
C PDR

P.O. BOX 182, 1160 U.S. ROUTE 50, MILFORD, OHIO, 45150-9705, U.S.A.
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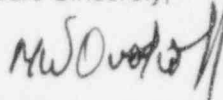
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5. As part of the written procedures concerning the production/distribution of license exempt quantities (as referenced in 2. above), instructions are included to direct that no more than ten exempt quantity items shall be shipped in any single package.
6. The above referenced written procedures also include directions that, for the purpose of shipping, the lecture bottle containing exempt quantities of calibration gas shall be detached from the rest of the calibrator.

Please advise me if our actions, as outlined here, and in the included material, have, as is intended, met with requirements, or, if not, let me know what further actions are required.

Yours Sincerely,



M. W. Overhoff, PhD
President

MWO:blw

Encl.

cc: State of Ohio

Mr Ken Tring



MANAGEMENT AUDIT

In order to ensure that possession limits will not be exceeded, Dr. M. W. Overhoff, the Company RSO, has directed our consultant RSO (Mr. Ken Fritz) to physically audit our stock of Kr85 sealed sources, and thereby verify that our stock is less than the quantity permitted under our current license No. 34-18214-01.

The consultant will submit a written report of his findings to Dr. M. W. Overhoff, the Company RSO, showing compliance, or non-compliance, as the case may be.

In the event that it is discovered that the allowed limit has (inadvertently) been exceeded, then the excess number of sealed sources will immediately be segregated and placed under lock and key.

The US NRC will be notified, and OTC management will determine what to do about the excess material, and how to remove it from the premises.

September 25, 1996

A handwritten signature in dark ink, appearing to read "M. W. Overhoff", is written over a horizontal line.

M. W. Overhoff, RSO