



EG&G

35 CONGRESS STREET, P.O. BOX 5006, SALEM, MASSACHUSETTS 01970-6521
TEL: (508) 745-3200 TLX: 6817405 FAX: (508) 745-0894

December 23, 1996

U.S. Nuclear Regulatory Commission
ATTN.: Document Control Desk
Washington, D.C. 20555

Dear Sir/Madam:

This is in response to the Notice of Violation received as a result of the audit of EG&G's Radioactive Protection Program performed on November 1, 1996 (reference inspection nos. 030-04625/96-001 and 030-22545/96-001).

As a result of the Notice, the following corrective and preventive actions were taken:

1. *Finding: Monthly and quarterly surveys were not performed in areas where licensed material is used or stored since 1992.*

Monthly and quarterly inspections of areas using Carbon-14 were not done since February 1992. During the 2nd quarter of 1992, all production in which C-14 was used had ceased. At this time, the area where C-14 was applied had been closed. All equipment remained in the area in the event that production was resumed. In May, 1996, we hired an outside agency, Radiation Safety Associates Inc., to decommission the rooms where carbon-14 was stored and/or used. At this time, they conducted sampling to ensure that the areas were free of radioactive contamination. On June 14, 1996, they issued a report of their findings. In October, 1996, Radiation Safety Associates removed all of the waste drums of radioactive materials from our facility. We failed to notify the NRC that we had eliminated C-14 from our processes and had decommissioned those areas where carbon 14 was stored and/or used. We are reviewing the NRC document "Timeliness in Decommissioning of Material Facilities". We will notify the NRC of the decommissioning by forwarding the sampling data and other requirements per the NRC document. This will be completed by 3/1/97.

2. *Finding: Two survey meters (E463 and E285) were not calibrated at 6 month intervals as required by our license.*

E#285: This meter was calibrated on April 10, 1996. Prior to that, it had not been calibrated since March 22, 1993. EG&G possesses two of these monitors. When one needs repair, the second is then put in operation. From 3/22/93 through 4/10/96, the second unit, E#467, was in operation. A review of the calibration data (see attached) for this unit shows that E#467 was calibrated at maximum, every 6 months. This was an oversight during the NRC audit.

9612270050 961223
PDR ADOCK 03004625
C PDR

IE07/1

E#463: This meter has been calibrated at yearly intervals. Calibration records show that it should have been calibrated every 6 months. The Calibration department has been issued a memo indicating the error in their calibration cycles. They will ensure that the unit be put on a 6 month calibration schedule.

3. *Finding: Training of radiation workers was not conducted since February, 1992. Training is required at least every 2 years.*

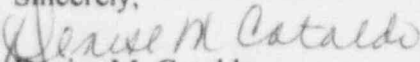
No system was in place to ensure that appropriate personnel received training at stated intervals. The management of the department will implement a system in which the employees requiring training are identified. The type of training that these employees will need will be documented and become part of EG&G's present training database. The management of the department will work with the Environmental/Safety Manager and the department's Assistant Radiation Safety Officer to develop and present the training to the employees. This will be accomplished by 2/15/97.

4. *Finding: Audits of the content of and implementation of the radiation protection program have not been conducted since Feb. 1992.*

As part of our Environmental Management System, audits of production areas are done on a monthly basis (a different area each month.) Our audit trails and reports of the areas using radioactive materials do not indicate that audits of the radioactive protection program have been done. We are changing the manner in which environmental/safety audits are performed. Starting 1/97, we will conduct quarterly facility-wide audits. These audits will include radiation safety. Checklists will be developed for auditor reference. Audits will be conducted in the following months: March, June, September, December. Auditors will receive training prior to conducting the audit. The training will include the radiation safety auditing checklist.

If there are any further explanations required, please contact me at 508-734-3209 x566.

Sincerely,


Denise M. Cataldo
Environmental/Safety Manager

CC: Regional Administrator, Region I

CALIBRATION RECORD

CAL. IDENT. NO. E-467 CAL. PROCEDURE NO. MFG. SPEC.

CHECK POINTS

DATE CALIBRATED	$\mu\text{Ci}/\text{m}^3$	CALC. $\mu\text{Ci}/\text{m}^3$							NOTES
									OUTLET PRESSURE @ 25/4
4-14-92	3.9	3.86						12	" "
6-2-92	3.9	3.82						12	" "
7-31-92	3.7	3.61						12	" "
9-29-92	3.7	3.58						12	" "
* 11-24-92	3.6	3.45						12	" "
1-22-93	3.6	3.42						12	" "
3-25-93	3.0	2.86						12	" "
5-20-93	3.0	2.799						12	" "
7-26-93	3.2	2.953						12	" "
* 9-21-93	3.4	3.112						12	" "
11-18-93	3.0	2.721						12	" "
1-12-94	3.2	2.873						12	" "
4-11-94	3.3	2.919						12	" "
6-29-94	3.2	2.793						12	" "
* 9-26-94	2.7	2.333						12	" "
12-19-94	2.7	2.301						12	" "
16 MAR 95	2.4	2.007						12	" "
13 JUN 95	3.2	2.653						12	" "
5 SEP 95	3.5	2.860						12	" "
* 30 NOV 95	3.5	2.835						12	
27 FEB 96	3.5	2.794							