



December 6, 1985

Mr. Thomas T. Martin
Division of Radiation Safety and Safeguards
U.S. NRC Region I
631 Park Avenue
King of Prussia, PA 19406

Gentlemen:

This refers to your letter dated 31 October 1985 detailing the results of your inspection of our facility on 5 August 1985. Appendix A of your letter was a Notice of Violation which required a reply within 30 days.

I have enclosed a copy of a letter I sent to your office dated 2 August 1985 which describes the actions which we have taken to address this problem. We have been in full compliance since 2 August 1985.

I hope that this information will be sufficient to close this matter. If you require any further information, please contact me.

Best regards,

A handwritten signature in dark ink, appearing to read 'Brian Skoczinski'.

Brian Skoczinski
Radiation Safety Officer

BS/ajr

enc.

cc: Bill Patterson

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REG1 LIC30
18-17303-01 PDR

Ventrex Laboratories, Inc.

217 Read Street Portland, ME USA 04103
(207) 773-7231 1-800-341-0463 TX 710 221 6452



August 2, 1985

Mr. John Glenn
USNRC Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Glenn:

I recently received a call from Mr. Tom Thompson of your office regarding Ventrex Laboratories' procedures for disposal of our liquid Iodine-125 waste into the sewerage system. Mr. Thompson stated that he had recently inspected the Foundation for Blood Research in nearby Scarborough and had uncovered problems in their procedures for disposal of liquid waste. This apparently prompted Mr. Thompson to review the records of other licensees in Maine.

I told Mr. Thompson that our liquid waste disposal was done on the basis of a weekly average of water usage and that, as described in my letter to your office dated 21 September, 1983, we would be disposing of waste not to exceed 1.0 millicuries per week. I had been advised by our consultant that water usage and concentration limits outlined in 10 CFR Part 20.303 could be averaged by the month and felt, therefore, that our weekly limit was well within the regulations.

However, Mr. Thompson pointed out that there is a daily limit described in 10 CFR Part 20.303 and that we were in violation by averaging our disposal on a weekly basis. I told Mr. Thompson that I felt that since we had been granted an amendment to our license on the basis of my letter that there was implicit approval for our disposal program, but that we would make every effort to conduct our activities so as to comply with this more restrictive limit.

To that end I have recalculated our water usage which is the basis for our daily limit. I have made the assumption that since we operate 40 hours per weeks that all our water usage takes place in five rather than seven days per week. Our average water usage for the previous twelve months has been 9,670 cubic feet per month. With an average of 21.7 working

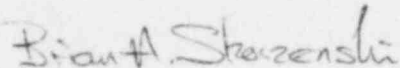
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Ventrex Laboratories, Inc.

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days per month our average daily water usage is 445 cubic feet per day or 3,338 gallons per day or 1.26 E07 milliliters per day. Applying the appropriate factor from 10 CFR Part 20, Appendix B, Table I, Column 2 (4 E-05 microcuries per milliliter) yields a daily limit of 504 microcuries per day. Therefore, all future releases of Iodine-125 into the sewerage system will not exceed 400 microcuries per day.

I have enclosed a table of material released to date for your review. I hope that you will deem these actions to be sufficient to address this problem. Please let me know if you require further information.

Sincerely,



Brian A. Skoczinski
Radiation Safety Officer

Enc.

cc: Bill Patterson
Myron Hamer

Mr. John Glenn 2 August, 1985

RELEASE DATE	ACTIVITY RELEASED (microcuries)
4-26-84	984
4-30	345
5-02	721
5-03	278
5-14	74
5-16	352
5-17	288
5-18	246
6-01	362
6-06	227
6-07	61
6-08	35
6-11	388
6-13	486
6-14	579
7-06	913
7-09	663
7-10	60
7-11	176
7-12	45
7-20	795
7-23	417
8-06	973
8-16	768
8-23	992
8-28	965
9-05	899
9-10	682
9-15	343
9-21	943
10-09	967
10-29	973
11-08	993
12-20	824
12-21	155
01-05-85	725
1-06	726
1-14	977
1-24	971
1-30	902
3-04	954
3-15	1002
4-22	950
5-08	983
5-17	975
5-24	979
6-06	921
6-14	890
6-21	848
7-03	660
7-15	248