April 18, 1997

Kevin Givens Senior Vice President Sandusky, Limited 3130 West Monroe Street Sandusky, OH 44870

SUBJECT: NRC INSPECTION

Dear Mr. Givens:

This refers to the inspection conducted on March 26, 1997, at your Sandusky, Ohio plant. The purpose of the inspection was to det... nine whether activities authorized by NRC Byproduct Material License No. 34-26755-01 were conducted safely and in accordance with NRC requirements. The inspection also included a review of selected activities involving the use of backscatter gaugas, possessed under the general license provisions of 10 CFR 31.5. At the conclusion of the inspection, the findings were discussed with you and members of your staff. This also refers to the April 11, 1997 telephone conversation between Mr. Wayne Slawinski of my staff and Ms. Emily Smola, at which time the inspection findings were discussed further.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, independent measurements and observation of activities in progress.

No violations of NRC requirements were identified during the course of this inspection of activities authorized under License No. 34-26755-01. However, concerns associated with the use of the generally licensed devices installed on product line C-2 were identified. Specifically, we are concerned that: (1) radiation levels in accessible areas near the devices were greater than those allowed for unrestricted areas in 10 CFR 20.1301; and (2) your staff was not sufficiently aware of the radiation levels produced by the devices.

In response to these concerns, we understand that on March 27, 1997, the following administrative controls were put in place:

- 1. The areas in the immediate vicinity of each device were posted as Radiation Areas.
- Individuals working at product line C-2 or others that may have a need to frequent that area were:

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- Informed of the radiation conditions present in the immediate vicinity of the devices.
- Instructed to keep their hands, arms and body away from the direct radiation beam.
- Instructed to contact Emily Smola, the radiation safety officer, if the need exists to perform maintenance or other work in the immediate vicinity of the devices.

No response to this letter is required unless our understanding of your administrative controls is incorrect.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room (PDR).

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Signed by Roy J. Caniano

Roy J. Caniano, Director Division of Nuclear Materials Safety

License No. 34-26755-01 Docket No. 030-34243

and

10 CFR 31.5 General License

Docket No. 99990003

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H. Clayton, EICS

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