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Department of Human Resources
HEALTH DIVISION

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Due 7/16/82*

June 15, 1982

G. Wayne Kerr, Director
Office of State Programs
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Kerr:

The following information is regarding your November 27, 1981, request for information and data on problems concerning generally licensed devices.

On December 21, 1981, I advised you of a problem we had identified in Oregon regarding four generally licensed gauges, each containing 100 millicuries of Americium-241 in normal form. Since the manufacturer of the gauges no longer held a valid radioactive materials license and could not accept or transfer them, the Oregon licensee elected to place the gauges in storage in their facility. Around May 19, 1982, this plant closed and dismantling of the facility began, making the question of transfer or disposal critical. At this time it appears that we may be able to arrange for a State of Washington licensee to take possession of these sources. If, however, that option is lost, we may be forced to take possession of the sources to preclude improper disposal. With plant closures escalating, we look for continued difficulties.

As a result of this incident we are considering putting a ban on all further receipts by Oregon general licensees of non-special form Americium-241. This would preclude our being forced to accept the expense of storage and disposal.

In March of this year, another problem concerning generally licensed devices came to our attention. By way of a physician inquiring about the radiation exposure from tritium, we found that an Oregon company had disposed of luminous safety devices for aircraft in a sanitary landfill. An unknown number of tritium exit markers were removed from 28 aircraft and disposed of between 1972 and 1979 by this company. These aircraft were being converted from passenger to cargo aircraft. One luminous safety device was recovered and was labeled in accordance with 10 CFR 32.54, indicating that the device contains 2.2 Curies of tritium dated June, 1966.

It was determined that a minimum of three transfers took place between manufacture by McDonald Douglas and purchase from United Aircraft Leasing

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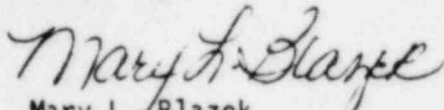
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by the Oregon firm. 10 CFR Part 31.5(c)(9)(i) requires that a report be made to N.M.S.S. within 30 days of a transfer from one general licensee to another. It appears that the requirements for reporting transfers and for providing the transferee with appropriate regulations and safety documents are not being met, resulting in loss of control of these devices.

We would appreciate any recommendations you may have to aid us in our attempt at solving these problems.

This information is also intended to aid you in providing a basis for action regarding the general license concept.

Sincerely,


Mary L. Blazek
Radiation Specialist
Radiation Control Section

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cc: Nuclear Materials Safety and Safeguards