

Allegheny Laboratories  
P.O. Box 174  
Franklin, PA 16323

July 10, 1987

United States  
Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

ATTN: John D. Kenneman

Gentlemen:

SUBJECT: Inspection #87-01  
Conducted on April 2, 1987

The Corrective Steps Taken Are As Follows:

1. On July 1, 1987, we had a four hour Radiographer Refresher Course. The course covered and updated Allegheny Laboratories Radiation Safety Operating And Emergency Procedures Manual.

On July 9, 1987, We, again, had a four hour Radiographer Refresher Training Course. The first two hours covered How Time, Distance, and Shielding will affect your dose. For the remaining time, I explained how Radiography Cameras are cleaned and work. The radiographer that attended these courses were Daniel Hoffman and Stephen Lewis. I, Charles McClelland, was the instructor. They have been documented and placed on file.

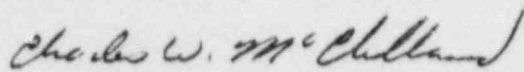
2. Storage Surveys are now made and maintained when the survey is the last one performed in the work day. Enclosed is a copy of our new Radiation Reports which states this.
3. Statistical Summary Reports of the Personnel Monitoring Information have been sent to the NRC for the years of 1985 and 1986. These reports are also enclosed.

In the future, we will submit these Statistical Summary Reports within the first quarter of each calendar year.

4. We have, also, upgraded our locking system.

Full compliance was achieved on July 9, 1987 and will continue hereafter.

Sincerely,

A handwritten signature in cursive script, reading "Charles W. McClelland".

Charles W. McClelland  
President  
Allegheny Laboratories



6/15/87  
UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

10 JUN 1987

License No. 37-20734-01

Docket No. 030-22013

Allegheny Laboratories  
ATTN: C. W. McClelland  
President  
P.O. Box 174  
Franklin, Pennsylvania 16323

Gentlemen:

Subject: Routine Inspection No. 87-01

On April 2, 1987, Mr. R. H. Ladun of this office conducted a routine safety inspection at your L. R. 60011, R.D. #2 Kennerdell, Pennsylvania storage facility of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. The findings of the inspection were discussed with yourself and other members of your staff at the conclusion of the inspection.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed as Appendix A and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

As discussed during the meeting at the conclusion of the inspection, we are concerned that the single lock used to secure your steel source storage vault door does not appear to offer a high degree of security. Based on these discussions, we understand that you plan to review this matter and determine whether it is necessary to upgrade the locking system. Please describe any action which you plan to take or have taken in your reply to this letter.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

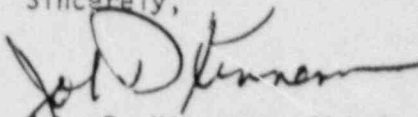
The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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2pp

10 JUN 1987

Your cooperation with us is appreciated.

Sincerely,



John D. Kinneman, Chief  
Nuclear Materials Safety Section A  
Division of Radiation Safety  
and Safeguards

Enclosure: Appendix A, Notice of Violation

cc: w/enclosure  
Public Document Room (PDR)  
Nuclear Safety Information Center (NSIC)  
Commonwealth of Pennsylvania

APPENDIX A  
NOTICE OF VIOLATION

Allegheny Laboratories  
Franklin, Pennsylvania 16323

Docket No. 030-22013  
License No. 37-20734-01

As a result of the inspection conducted on April 2, 1987, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1986), the following violations were identified:

- A. Condition 17 of License No. 37-20734-01 requires that licensed material be possessed and used in accordance with the statements, representations and procedures contained in an application dated August 1, 1983. Included in this application is the Radiation Safety Administrative Manual. Section 5.2.8.(a) of this Manual requires that radiographer annual refresher training be documented and placed on file.

Contrary to the above, as of April 2, 1987, radiographer annual refresher training for 1985 and 1986 was not documented and placed on file.

This is a Severity Level V violation (Supplement VI).

- B. 10 CFR 34.43(c) requires that a record of the storage survey required by 10 CFR 34.43(d) be made and maintained for three years when it is the last storage survey performed in the work day.

Contrary to the above, as of April 2, 1987, records of the storage survey were not made and maintained when the survey was the last one performed in the work day.

This is a Severity Level IV violation (Supplement VI).

- C. 10 CFR 20.407 requires that within the first quarter of each calendar year that the licensee submit to the NRC a statistical summary report of the personnel monitoring information recorded by the licensee for individuals for whom personnel monitoring was required.

Contrary to the above as of April 2, 1987, the required statistical summary reports were not submitted to the NRC for the years 1985 and 1986.

This is a Severity Level IV violation (Supplement VI).

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Pursuant to the provisions of 10 CFR 2.201, Allegheny Laboratories is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.



**Allegheny Laboratories  
Radiation Report**

**WARNING - INTENTIONAL FAILURE TO RECORD  
INFORMATION ACCURATELY ON THIS FORM CAN RESULT  
IN A FINE AND/OR DISCIPLINARY ACTION.**

Date \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_

Project \_\_\_\_\_ Customer \_\_\_\_\_

IR-192	SOURCE OF RADIATION CO-60 <input type="checkbox"/>	X-RAY <input type="checkbox"/>
S'N _____	S N _____	

Activity  
Of Source \_\_\_\_\_  
Survey \_\_\_\_\_  
Instrument \_\_\_\_\_  
Model No. \_\_\_\_\_

Curie

Exposure  
Device \_\_\_\_\_  
Model No. \_\_\_\_\_

RADIOGRAPHIC EQUIPMENT INSPECTED  
IN ACCORDANCE WITH ALLEGHENY LAB  
PROCEDURE DAILY CHECK LIST.

Inspection Completed By \_\_\_\_\_

Record of physical survey made. The last survey performed in work day for storage of source.	
IR-192 _____	MR/HR 6" From Surface
CO-60 _____	MR/HR Surface Of Exposure Device.

Total Exposure  
Time For This Day \_\_\_\_\_ Hr. \_\_\_\_\_ Mins.

Personnel  
Informed \_\_\_\_\_

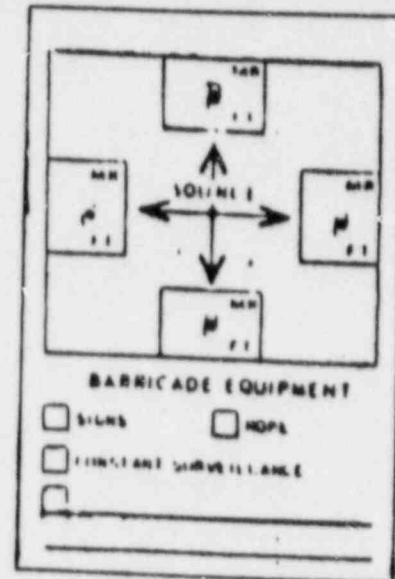
Radiographer  
Serial No. \_\_\_\_\_  
Of Dosimeter \_\_\_\_\_  
Total \_\_\_\_\_

MR Recorded Start	Finish	MR	And Start	Finish	MR
Film Badge					
And Serial No.			And		

Remarks: \_\_\_\_\_

VOID DATE

**RESULT OF PHYSICAL SURVEY**



Radiographer's  
Assistant \_\_\_\_\_

MR./Hr  
OF Driver

**SURVEY OF TRANSPORTING VEHICLE**

Mr./Hr. of

Outside Surface

Mr./Hr.

1 From Surface

RADIATION SAFETY OFFICE