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5 May 2020

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: Reply to a Notice of Violation
NRC License No. 53-00515-01
Docket No. 030-06839

Violation Identified

Contrary to regulations, the licensee possessed byproduct material types and quantities that were not authorized under its specific NRC Materials License 53-00515-01. Specifically:

1. Since June 12, 2013, NRC Materials License 53-00515-01, Amendment 71, removed the authorization for nickel-63; however, the licensee continued to possess three Tracor Model 111019 electron capture detector (ECD) cells containing nickel-63 foil, 2 with 10-millicurie each and 1 with 15-millicurie, which require a specific license to possess.
2. On 15 January 2020, the licensee possessed a Varian ECD cell Model 01-000046-00 containing 250 millicurie of hydrogen-3, exceeding the maximum possession limit of hydrogen-3 authorized by NRC Materials License 53-00515-01, Amendment 74 dated 28 February 2018.

Licensee Response

We do not dispute this violation.

1. Reason for Violation:

The Ni-63 sources in question were listed on the inventory at the previous Aiea facility until early 2009. In August 2009, all waste was packed into drums and transported to the current Waipahu facility. The inventory of the waste drum contents did not include the three Ni-63 sources. In an effort to minimize risk of contamination in the current laboratory, the drums have remained sealed for several years, so we were unaware that the drum inventory was incomplete. It was believed that these three Ni-63 sources had been returned to the manufacturer in 2009.

The source inventory after the move in 2009 indicated only one Ni-63 source still in use. This source was returned to the manufacturer for disposal in 2013. At this point, we believed we no longer possessed Ni-63, so authorization for Ni-63 was removed from the

license. The three other Ni-63 sources were discovered recently in the waste drums while consolidating the waste for disposal.

The H-3 ECD in question is not shown on any available inventory record and was also not included in the waste drum inventory. It is possible that it was found while preparing to move out of the Aiea facility in 2009, and it was added to one of the waste drums without recording it in the waste log. This source was discovered recently while consolidating the waste for disposal.

2. Immediate Corrective Action:

Authorization for possession of the Ni-63 and H-3 ECD cells was requested in the license renewal application submitted 29 January 2020.

3. Corrective Action to Prevent Recurrence:

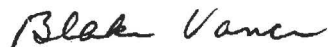
An accurate inventory of the waste drums has been made. We intend to dispose of this waste and terminate our license within the next year.

4. Date When Full Compliance Will Be Achieved:

Full compliance was achieved on 29 January 2020.

Thank you for drawing attention to these issues and giving us an opportunity to correct them. We will ensure that such violations are not repeated.

Sincerely,



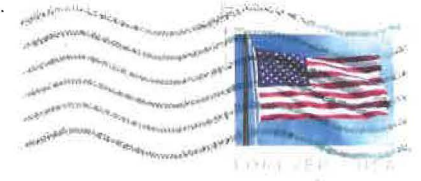
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