andacted Don Sumanit during The Goodyear Tire & Rubber Company

Akron, Ohio 44:316-0001

August 3, 1982

Region III Licensing Section Material Licensing Branch Division of Fuel Cycle and Material Safety 799 Roosevelt Road Glen Ellyn, IL 60137

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Subject:

25 mCi Am - 241 S/N 220

On Wednesday, July 7, 1982, it was discovered that a 25 mCi Am-241 (Model RTA-41F) sealed source was missing from a group of three sources that was in storage since their removal from use in 1978. The source was purchased from Nuclear Development Corporation (NDC) in January 1975, under an NDC General License number 1933-59. This was initially installed on #2-4 Roll Calender, D/241A, Plant II Tires, on the third floor of Building 74. Our records show that the source was still in this location in 1977.

In 1978, Plant II Tires was shut down, and the sources were supposedly removed and placed in R L Lunsford's (Production Superintendent) office for storage. Mr Lunsford recently retired, at which time the sources were shipped to the Instrument Lab. (This was confirmed by contacting Mr Lunsford at his home.) After arriving in the Instrument Lab, the three suitcases containing the sources were physically inspected, and it was discovered that only two complete units were contained in the suitcases.

In April of 1981, the #2-4 Roll Calender was scheduled to be scrapped. This was verified through Mr Carlson (Properties and Budget), G Williams and M Valentine (Purchasing), and Mr Koroly (Engineering Department and Tech Center Maintenance). The Luntz Corporation was contracted for the removal of the scrapped metal from #2 calender.

Mr Scope, at Luntz Corporation, was cc +acted concerning the disposition of the scrap metal. He informed us that the metal was recycled almost as soon as it was received. He also stated that at that time they were selling scrap to both Republic Steel and Timken. Mr Scope felt that this particular metal scrap was sold to Timken for melting and recycling.

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It is our belief that the source in question was never removed from the #2-4 roll calender and was, therefore, sold along with the metal scrap from the calender and was subsequently melted. The Am-241 would have vaporized at the operating temperatures of the furnace (greater than 1400°C). It is also our belief that there would be no significant employee exposure during the melting nor would their be any detectable radiation levels around the plant due to the high volume of exhaust air common for this type of operation.

Recent changes have been made in our radiation program including a complete updating of all handling procedures, more strict control of all purchases and removls, and the issuing of a standard practice letter (copy enclosed) coordinating all activities concerning sealed sources through the Industrial Hygiene Department. We believe that these changes should assure proper control, use and disposal of all sealed sources in the future.

If you have any questions, please contact me at (216) 796-4531.

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J L Holtshouser Corporate Radiation Protection Officer Manager, Corporate Industrial Hygiene Goodyear Tire & Rubber Company 1144 Fast Market Street Akron, OH 44316-0001

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## STANDARD PRACTICE LETTER AKRON, OHIO

SP. NO. 81-46

FO & GO GENERAL NOTICE PLUS INTERPLANT DELIVER J L HOLTSHOUSER MANAGER TO. CORPORATE INDUSTRIAL HYGIENE DEPT 108 Is

DATE March 25, 1981

SUBJECT.

RADIATION DEVICES UTILIZED IN GOODYEAR DOMESTIC PLANTS

All radiation devices utilized in Goodyear domestic plants are licensed through the Nuclear Regulatory Commission (NRC) in one of three ways:

(1) By broad form type specific license issued directly to Goodyear under the responsibility of the Corporate Radiation Protection Officer (RPO) (J L Holtshouser, Mgr., of Corporate Industrial Hygiene), (2) By a specific license to the plant in NRC agreement states, (3) By a general license issued by the NRC to manufacturers of source material in order to provide for the sale of sealed sources for industrial use.

Further explanation of the three licensing methods.

- Broadform Type License Under this license the corporate RPO has the sole responsibility for the approval or dissapproval for procurement, storage, use, monitoring, disposal, recordkeeping, license, fees, and the safe handling of radioactive material.
- (2) Specific License issued by a state, under a plan approved by the Federal NRC, for the use of sealed sources within the states boundaries. In these states the users (Goodyear) are forbidden any activity such as installation, removal, disposal, or relocation of sealed sources. These activities are limited to the manufacturer of the source. Goodyear plants with this type of license must still obtain prior approval from the corporate RPO before any activity, other than normal use, is arranged, or new sources are purchased.
- (3) Plants with sources covered by a <u>General License</u> are also strictly limited to only normal use of the source and will be held accountable to the corporate RPO for proper use of sealed sources. Any activity such as removal, installation, disposal or relocation can <u>only</u> be carried out by the manufacturer of the source.

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ISSUED BY	Department 1	.081	APP	ROVALS			
OFFICERS OF THE COMPANY	GENERAL MANAGERS	SALES	COMPTROLLERS DIVISION	MANUFACTURING SERVICES	SECRETARYS	INDUSTRIAL RELATIONS	PUBLIC
Barrett				Leary	Ito		
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The new broad from type license by Goodyear Tire & Rubber Company replaces the NRC specific licenses at the plants listed below.

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Akron Plant B (GAC)	34-01149-02		
Akron Plant C	34-00508-03		
Akron Plant 5	34-00508-12		
Akron Plant 1	34-00508-13		
Point Pleasant	34-00508-14		
Lawton	34-00508-15		
Danville	\$5-13325-01		

All other Goodyear plants in NRC controlledestates will be required to obtained all future sources under this new license, after approval has been obtained from the corporate RPO.

The coordination of all activity concerning sealed sources should go through the corporate RPO in order to eliminate the possibility for improper handling of such sources which could result in the imposition of a fine of not more than \$10,000, imprisonment for not more than 10 years, and/or removal of the plant license. All plants are therefore, reminded that:

BEFORE ANY SEALED RADIATION SOURCE, CONTROLLED UNDER <u>ANY</u> OF THE THREE FORMS OF LICENSING, <u>IS</u> NEWLY INSTALLED OR REMOVED <u>FROM ITS PRESENT SITE</u>, WHETHER WITHIN THE SAME FLANT OR ELSEWHERE, APPROVAL AND CLEARANCE FOR SUCH INSTALLATION OR REMOVAL MUST BE OBTAINED FROM CORPORATE INDUSTRIAL HYGIENE.