MAR 7 1988

License No. 04-00720-02
[redacted] 03003602

Chevron Research Company
576 Standard Avenue
Richmond, California 94802

Attention: Mr. J. A. Robbers, General Manager
Research Services Department

Gentlemen:

Thank you for your letter of February 24, 1988, in response to our Notice of Violation, dated January 26, 1988, informing us of the steps you have taken to correct the items which we brought to your attention. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

Original Signed
James L. Montgomery, Chief
Nuclear Materials Safety and
Safeguards Branch

bcc w/cy ltr dtd 2/24/88:
RSB/Document Control Desk (RIDS) (IE05)
B. Faulkenberry
J. Martin
J. Zollicoffer

bcc w/o cy of ltr dtd 2/24/88:
M. Smith

Region V

[REQUEST COPY]	[REQUEST COPY]	[REQUEST COPY]
[YES / (NO)]	[YES / (NO)]	[YES / (NO)]
		[SEND TO PDR]
		[(YES) / NO]
DSkov/norma	RDThomas	JLMontgomery
3/4/88	3/4/88	3/7/88

8803160141 880307
REG5 LIC30
04-00720-02 DCD

1/1
IE05

THOMAS

Chevron Research Company

February 24, 1988

Reply to a Notice of Violation
License No. 04-00720-02

United States Nuclear
Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Attention: Document Control Desk

Gentlemen:

We have no serious disagreement with the findings of Mr. David D. Skov's inspection on December 4 and 7, 1987, or with the discussion with Mr. Thomas and Ms. Riedlinger held on January 12, 1988. We agree that with an internal audit system we could have found these deficiencies before the inspection. We now have systems in place that should prevent such occurrences. These will be described below.

We would like to remove the impression that radiation safety is not getting the attention it deserves. In fact, the violations mostly occurred during a period when the Field Testing Group was being supervised by an individual who did not feel that record-keeping was as important as performing tests. This serious attitude problem has disappeared with his retirement. We expect complete compliance with the rules from our current staff.

We have created a new checklist (attached) that must be filled out for every test that specifies every record and detail that must be recorded. This helps capture information that is useful for the test and necessary for compliance. We have also created the attached Internal Audit Checklist for use during unannounced audits which we plan to have several times per year.

Addressing the individual violations:

A. The three sources in question, which had been in storage before they were needed for the field tests, were supposed to be leak tested before use. We know that the people involved did not check the date of the latest leak test and did not follow the rules and leak test them before use. We are checking all the records for similar deficiencies. Newly written procedures require that anyone taking out a source must check all the pertinent records for completeness and leak test the source if six months has passed since the last leak test. Checking for compliance is an item on our audit list. Full compliance will be achieved by March 1, 1988.

~~8802290171~~

5/8

B.1. During the period in question the accepted procedure was to calibrate the survey meters every six months. However, the attitude in effect seemed to regard this as a target only and when the work pressures mounted, the calibration was allowed to slide. This faulty procedure inevitably resulted in missed deadlines and violation of the rules. We have switched to a four-month calibration cycle and intend to adhere closely to it. Checking for compliance is an item on our audit list. Full compliance will be achieved by March 1, 1988.

B.2. Likewise, pocket dosimeters were supposed to be calibrated every six months but frequently were not. They too are now scheduled for calibration every four months. Checking for compliance is now an item on our audit list. Full compliance will be achieved by March 1, 1988.

C. We cannot explain the misrepresentation of the activity of the shipped sources referred to in this violation. We have reemphasized the importance of correct identification of all shipped materials. Checking for compliance is now an item on our audit list. Full compliance will be achieved by March 1, 1988.

D. While it has always been standard procedure to survey the job sites and block off the appropriate area, records were not kept of the details or that such a survey was made. Such recordkeeping is now part of the standard operating procedure and the checklist reminds the workers to record the facts. Checking for compliance is now an item on our audit list. Full compliance will be achieved by March 1, 1988.

E. The fact that all shipping papers must be kept was well known to our workers. The unnecessary complexity of our system with multiple log books and file holders did not make it easy to notice when a particular item was missing. We have streamlined the storage system and included places on our checklist for noting that all required copies are filed. Checking for compliance is now an item on our audit list. Full compliance will be achieved by March 1, 1988.

We have always been committed to the safe use of radioisotopes consistent with the ALARA concept. The documentation of program will be brought into full compliance with the terms and conditions of our license.

Yours truly,

O/O J A Robberecht

JWGreen:com/rad
Encl. - Radioactive Material License
Inventory Sheet

cc: Mr. James L. [illegible], Chief
Nuclear Materials [illegible] and
Safeguards Branch
Region V
1450 Maria Lane
Walnut Creek, California 94596

CHEVRON RESEARCH COMPANY
ENVIRONMENTAL EMISSIONS AND RADIOTRACER
FIELD TESTING GROUP

DATE _____ PROJECT NUMBER _____

CUSTOMER _____ LOCATION _____

TEST _____

ISOTOPE QUANTITY	I.D. NUMBER	LAST WIPE[1]	WIPE RESULTS[1]	REFERENCE NUMBER[1]
1)				
2)				
3)				
4)				
5)				
6)				

DOSIMETER NUMBER _____ CALIBRATION DATE _____

SHIPPING INFORMATION[2]

TYPE OF SHIPPING CONTAINER _____

TYPE OF LABEL _____

CONTAINER SURFACE READINGS _____

TRANSPORT INDEX READINGS _____

SURVEY METER NUMBER _____ CALIBRATION DATE _____

JOB SITE SURVEY[3]

SURVEY METER NUMBER _____ CALIBRATION DATE _____

2 MR/HR SURVEY _____ _____

DOSIMETER NUMBER _____ USER INITIALS _____ _____

DOSIMETER CALIBRATION DATE _____

INITIAL READING _____ DATE _____ FINAL READING _____ DATE _____

[1]Conditions of California Materials License No. 0164-07 and NRC Materials License No. 04-00720-02.

[2]Conditions of NRC Inspection and Enforcement Information Notice No. 82-47 and DOT Regulations.

[3]Conditions of NRC Materials License No. 04-00720-02.

INTERNAL AUDIT CHECKLIST

1. ALL SHIPPING DOCUMENTS FOR RADIOACTIVE MATERIALS MUST BE ON FILE.

2. SHIPPING AND RECEIVING LOG: ALL RADIOACTIVE MATERIALS SHIPPED OR RECEIVED MUST BE LOGGED. SOURCE LOAN LOG: ALL SOURCES MUST BE LOGGED WHEN TAKEN IN OR OUT OF CHEVRON RESEARCH COMPANY.

3. INVENTORY CARDS FOR SOLID SOURCES MUST HAVE DATE OF LAST WIPE TEST. INVENTORY CARDS MUST SHOW AMOUNT REMAINING, AMOUNT WITHDRAWN, AND THE USE OF WITHDRAWN MATERIAL.

4. CHEVRON RESEARCH COMPANY SOLID SOURCE WIPE TESTS MUST BE DONE EVERY FOUR MONTHS. WIPE TEST RESULTS MUST BE ENTERED ON INVENTORY CARDS AND IN LABORATORY NOTEBOOK.

5. DOSIMETERS MUST BE CALIBRATED EVERY FOUR MONTHS. CALIBRATION RECORDS AND EXPOSURE RECORDS MUST BE REVIEWED FOR COMPLETENESS.

6. MONTHLY FILM BADGE RECORDS MUST BE FILED AND REVIEWED QUARTERLY.

7. SURVEY METERS MUST BE CALIBRATED EVERY FOUR MONTHS. RECORDS MUST SHOW ISOTOPE SOURCE AND STRENGTH, EXPOSURE RATE, AND ACTUAL METER READINGS.

8. JOB SITE SURVEYS MUST BE ON RECORD AND MUST CONTAIN SURVEY METER I.D. NUMBERS, METER CALIBRATION DATE, AND A DESCRIPTION OF THE SURVEYED AREA.

9. LABORATORY HOUSEKEEPING.