

Factory Mutual Research

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April 19, 1988

United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Attention: Mr. John R. White, Chief
Nuclear Materials Safety Section C
Division of Radiation Safety and Safeguards

Mr White,

This acknowledges your letter dated March 29, 1988 concerning Mr. C. T. Oberg's inspection of our facilities on August 25 and 26, 1987. It also acknowledges Appendix A Notice of Violation which was attached.

As a result of the inspection and discussion, corrective actions were implemented, as follows:

- 1) Radiation Safety Officer would conduct monthly audits of Records and Facility - begun September 3, 1987.
- 2) Purchase of a Tech/OPS Model 488 Source Changer - completed on October 7, 1987.
- 3) A search of our files uncovered the original copy of the Audit performed on April 4, 1987 - completed on August 28, 1987.

ITEM A

This violation refers to the amount of training received and the examination which was administered. It had been our policy to administer both written and oral examinations at the discretion of the Radiation Safety Officer at the completion of yearly training. We also conducted training classes periodically throughout the year. We now view these procedures to be inadequate and incompatible with our record-keeping practices.

As a first step, each radiographer was given additional training (four hours) and a written comprehensive examination was administered. This was completed on January 12, 1988. Additionally, we have scheduled a full day of training in May, 1988. Any changes to our "Operating and Emergency Procedures", including Radiation Safety and the Transport of Sealed Sources, will also be discussed at Monthly Section Meetings.

ITEM B

This violation refers to the record of a radiographer's performance performed

on April 4, 1987 which was not properly executed.

A search of our files uncovered the completed form which was then placed in a permanent file. Monthly audits of our files will insure that this oversight will not occur in the future.

ITEM C

This violation refers to the inspection and maintenance of radiographic devices in that Device No. 251 (T.O. Model 680 was not inspected between February 26 and July 23, 1987 and Device No. 1091 (T.O. 660) was not inspected between February 27 and June 17, 1987, periods in excess of three months.

The delay in performing the required maintenance and inspection on these devices was due in part to a delay we encountered in borrowing a source changer and that the radiographer who performs regular maintenance was on jury duty during the complete month of May. The devices were placed in storage on March 23, 1987 and were not used during the interval in excess of three months.

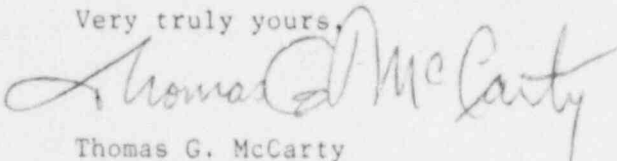
As a corrective step, in October 1987, we purchased a (Tech OPS Model 680) source changer to prevent any delays in maintenance or inspection.

In addition to the corrective steps mentioned in Items A, B, and C, FMRC Management has been asked to provide an auditor from a department not connected to the B&M Standards Department to conduct future unannounced audits of our files and operations in addition to our internal audit procedure.

We feel that with the aforementioned procedures in place, we are now in full compliance.

We are most anxious to make our facilities and operations as secure and safe as possible and certainly appreciate your recommendations for improvement.

Very truly yours,



Thomas G. McCarty
Manager B&M Standards Department

cc: J. F. Manning
Radiation Safety Officer

pcc