

SEP 30 1977

9/30/77

MEMORANDUM TO: Leo B. Higginbotham, Acting Director, Division of
Fuel Facility and Materials Safety Inspection
Office of Inspection and Enforcement, Headquarters

FROM: Boyce H. Grier, Director Region I

SUBJECT: PROPOSED RESPONSE TO RADIATION TECHNOLOGY, INC. LETTER
OF SEPTEMBER 27, 1977

Enclosed is a Region I proposed response to the September 27 letter from
Dr. Martin A. Welt, President of Radiation Technology, Inc., for Dr.
Volgenau's signature. Copies of the licensee's letter were provided to
Region I on September 28, 1977 during a meeting attended by Dr. Welt and
his consultant.

Boyce H. Grier
Director

Enclosure: As Stated

cc w/encl:
E. L. Jordan, X00S
G. H. Bidinger, FFMSI
J. Lieberman, OELD

bcc w/encl:
R. O. McClintock
P. R. Nelson
G. L. Snyder
J. Kinneman
M. Slobodien
J. Glenn

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PDR FOIA
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Sent King card
9/30/77

OFFICE	FF&MS	FE&MS	FF&MS	ASST TO DIR	DIRECTOR
SURNAME	Kinneman/mjd	McClintock	Nelson	Snyder	Grier
DATE	9/30/77	9/30/77	9/30/77		

PROPOSED

Radiation Technology, Inc.
ATTN: Martin A. Welt, PhD
President
Lake Denmark Road
Rockaway, New Jersey 07866

Gentlemen:

This is in reference to your letter of September 27, 1977, in response to the Order Suspending License sent to you with our letter of September 23, 1977. The September 23 letter concerned the overexposure of one of your employees in your in-air irradiation facility on September 23, 1977. After consideration of the report made by Mr. S. Haram, of your staff, on September 23, 1977 we concluded that Radiation Technology, Incorporated had not taken adequate actions to protect the public health and safety (licensee employees). Pending completion of the Commission's investigation and further Order of the Commission, the Order Suspending License, dated September 23, 1977, was issued effective immediately.

Your letter of September 27 describes actions taken by Radiation Technology to assure future compliance with NRC Rules and Regulations, and requests that (1) the Suspension Order be lifted as soon as possible, (2) Interim approval be given to permit movement of cobalt-60 pencils presently located at the bottom of the service irradiator cell pool (R&D pool), and (3) Operations be permitted to resume in the R&D pool.

With respect to your request that the Order Suspending License be lifted, as described in the Order and as discussed during the meeting in our Region I office on September 28, 1977 a further Order will be issued subsequent to the completion of the Commission's investigation of the circumstances surrounding the overexposure. This investigation includes an evaluation of any submittals which you may make, including your letter of September 27, 1977. You may be assured that this matter has been given priority attention by this office.

With respect to your request for interim approval to permit movement of cobalt-60 pencils because they may be in a condition which would permit corrosion, your letter of September 27 does not include sufficient

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information on which to judge the merits of your claim. Such information would include the length of time these sources have been in their present condition, what the circumstances are that may cause the stainless steel cladding to corrode, how the proposed storage conditions will differ from the present storage condition and preclude the possibility of corrosion, and other information which may be necessary to justify your requested action.

With respect to your request to be permitted to resume operations in the R&D pool, your letter of September 27 does not contain sufficient justification for an immediate modification of the Order Suspending License. While it is true that the overexposure occurred from operations of the in-air irradiation facility, the overexposure is the direct result of management actions and decisions to operate the in-air irradiation facility without the interlock and other safety equipment required by your license. Our immediate concern therefore extends to your use of all licensed by-product material.

As stated previously, this matter has been given priority attention by this office. However, the timeliness and thoroughness of any future submittals or responses which you may make will have an effect on the overall evaluation of the matter and the issuance of a further Order.

Sincerely,

Ernst Volgenau
Director, Office of Inspection and
Enforcement

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