



# Amway CORPORATION

T-6006-4060-MSH

7575 EAST FULTON ROAD, ADA, MICHIGAN 49355-0001

March 1, 1988

Mr. Bruce Mallett  
Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Mallett:

Attached is Amway's request for relief from the NRC order which suspends all general licenses for the use of 3M 200, 300, and 900 series air ionizers. The request was sent based on instructions per 3M's February 19, 1988, notice which indicates such relief could be granted upon a formal request to the NRC in situations where the use of the subject air ionizers is essential to the safety of the operation. Upon receipt of the NRC's order, however, it appears that while relief can be granted in those situations, it is only available if the use of the devices is not involved in applications involving food, beverages, pharmaceuticals or cosmetics.

As indicated in our attached request to the NRC, Amway uses four (4) 3M Model 210 air ionizers to eliminate the accumulation of static electricity on nylon worm spacer screws in an area where aerosol cans are gassed with hydrocarbon propellants. The operation involves two gassing stations. One nylon worm spacing screw is located on each side of both gassing stations. Aerosol cans containing product concentrate, with the lid and actuator valve stem in place but not crimped, are transported via a conveyor past the first worm spacer screw to the gas station where the propellant is injected into the can and the lid is crimped to the can. The sealed aerosol can is then transported via the conveyor past another nylon worm spacer screw and then out of the gas house area. The nylon worm spacer screws run parallel to the conveyor and are located approximately 3-5 feet from the gas station. The 3M Model 210 air ionizers are located directly above the worm spacer screws parallel to them and the conveyor. They are directed downward and are positioned below the rim level of the aerosol cans being conveyed past them.

The aerosol cans handled in this operation may contain cosmetic and drug products. Given the provisions of the NRC order, as well as the provision that the Director may relax or rescind any of these provisions, Amway Corporation is requesting that it be allowed to continue to use these devices.

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PDR REVGP NRGTH4CO  
PDR

UNITED STATES CANADA AUSTRALIA UNITED KINGDOM HONG KONG  
MALAYSIA WEST GERMANY REPUBLIC OF IRELAND FRANCE NETHERLANDS  
JAPAN SWITZERLAND BELGIUM TAIWAN AUSTRIA PANAMA ITALY NEW ZEALAND

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Mr. Bruce Mallett

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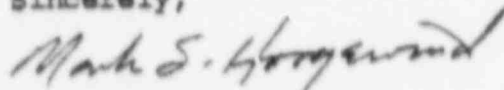
Given the necessity of these air ionizers for safety reasons, their lack of direct contact with product or the aerosol cans, their downward orientation and location below the rim level of the aerosol cans conveyed past them, and the covered and then sealed state of the cans passing by them, it is felt relief from the NRC's order for continued operation should be granted.

Amway is currently looking at suitable alternatives to ensure safety in this area. A move away from the 3M air ionizers is planned but the timing of this is, as you can understand, difficult to predict. We would hope to switch sometime in the next 3-6 months.

During the interim period, Amway would be willing to take precautions to ensure leakage has not and does not occur in the future. We would look to 3M or an outside consultant to perform the initial as well as periodic, i.e., monthly, radiation surveys. (We are currently attempting to make arrangements with 3M to do this.)

If you have any questions, feel free to contact me at (616)676-6876.

Sincerely,



Mark S. Hoogewind, M.P.H., C.I.H.  
Senior Group Leader  
Technical Services

MSH:kash:35

Enclosure

cc: R. Bednarz  
R. Jaglowski

## INTERNATIONAL COMMUNICATIONS FORM

ILLINOIS

FAX

MARCH 2, 1988

X

312-790-5693  
OR - 5605

COURIER

TO: BRUCE MALLET  
NUCLEAR REGULATORY COMMISSION  
FROM: MARK HOOGEWIND  
SUBJECT: RELIEF FROM NRC ORDER

PLEASE BE ADVISED, TWO PAGES FOLLOW.

AMWAY CORPORATION  
TELECOPIES

TO: Bruce Mariett  
FROM: MARK HOSGURD  
DATE: 3-2-88  
PAGES: 3 TO FOLLOW

IF ANY OF THE ABOVE NUMBERED PAGES ARE NOT RECEIVED,  
PLEASE CALL THE FOLLOWING NUMBER: 616-676-6800.

THANK YOU,  
CINDY SHERMAN

PLEASE COPY FOR THE FOLLOWING

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AMWAY CORPORATION FAX NUMBERS:

616-676-6177 - RAPICOM 3100  
616-676-5088 - RAPICOM 5000

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