

SOIL CONSULTING ENGINEERS

Soil and Material Testing Laboratories
Earth Work Supervision

PONCE BY - PASS KM. 259.8
BOX 198 - STATION 6
PONCE, PUERTO RICO 00731
TEL. 843-0538

November 18, 1981

MATERIAL LICENSING BRANCH

Division of Fuel Cycle and Material Safety

Nuclear Regulatory Commission

Washington, D.C. 20555

Attn: Mr. Paul R. Guinn

Re: Mail Control No. 09189
(030-19461)

Jaca, Sierra & Rivera
Geotechnical Engineers
Ponce, Puerto Rico

Gentlemen:

In reply to your communication of November 6, 1981, herein submitted is the additional information requested for:

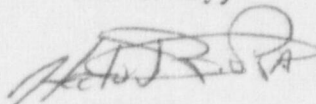
1. Santos Lebron is unexperienced in use of devices, but as stated on article 16 of our application: "he will attend formal training course given by Brainard-Kilman Drill Co. following the format set forth by Campbell-Pacific Nuclear Corporation in their training manual for instruction in the case, handling and safety precautions when dealing with radioactive materials. This course is mandatory prior to shipment of the CPN gauge. Duration of the course is 1-2 days, followed by completion of the application of the attendee."

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52-19885-02 PNU

2. Leak testing of sealed sources; safety procedures for transporting gauges or devices; Means of preventing unauthorized use and/or removal; described emergency procedures and maintenance on gauges involving removal of source holder, all as per enclosed written instructions "Nuclear Safety Procedures".

Sincerely,



HECTOR J. RIOS PAGAN

Radiation Safety Officer

NUCLEAR SAFETY PROCEDURES

2136

In accordance with our radiological health license, the following nuclear safety procedures will be followed at all times. These procedures are a part of the license and a copy of this procedure sheet will be kept with the gauge calibration curves with the gauge at all times.

1. The PORTAPROBE will be securely restrained in vehicles during transportation to prevent theft while the vehicle is unattended or damage from being thrown out during an accident. Metal clamps, chains, or seatbelts will be used to secure the units in open vehicles or vans with open interiors.
2. Keys to the permanent storage area will be made available only to the named users and the radiation safety officer.
3. All users will carry their film badges with them when using the PORTAPROBE or any other nuclear devices.

The badges will be stored away from the gauges when not in use and will be stored away from heat.

4. Radiation labels or placards will be removed from vehicles when the vehicles are not actually being used for transportation of nuclear devices to avoid confusion should an accident occur with the nuclear device not in the vehicle.

5. In the event of emergency involving possible damage to the radioactive source:

- * Freeze site, stop any vehicles involved with contact with the gauge.
- * Restrict access to the accident area to 10 feet from the gauge, vehicle and vehicle tracts.
- * Call for assistance. Obtain a survey meter to determine if a "spill" occurred.

* Call: R.S.O. 809 - 843-6366; 809-840-1340 (MR. HECTOR J. RIOS)

Nearest Public Health Office: 809-843-6363
809-844-2080

Civilian Defense: 809-842-0073; 809-844-8272

C.P.N. Factory: 415-687-6472

Other: 809-343-2330 FIRE DEPT. 809-343-2020 POLICE

6. Gauge dismantling involving removal of the source will only be performed by manufacturer.
7. Leak tests will be performed every 6 months or one year depending on state/federal requirements, using a CPN model A-401197 leak test kit.