

08 JAN 1987

License No. 37-11152-01
Docket No. 30-06249
Control No. 106548

Struthers Wells Corporation
ATTN: William G. Good
Radiation Safety Officer
1003 Pennsylvania Avenue, West
Warren, Pennsylvania 16365-0008

Gentlemen:

This is in reference to your request in a letter dated December 12, 1986 to amend License No. 37-11152-01. In order to continue our review, we need the following additional information:

Regarding the proposed use of a 100-curie cobalt-60 source in your permanent radiographic facility:

A. Please submit the following information.

1. The results of calculations or actual radiation measurements which indicate the expected radiation levels adjacent to, above, and below the facility.
2. Limitations, if needed, on positioning of sources or type (isotope) and amount of radioactive material which may be used in the facility to assure that areas adjacent to, above, and below the facilities will be unrestricted areas during performance of radiography.

The radiation levels around the facility in all directions, including the roof, should be an unrestricted area. The radiation level in all directions around the facility should not exceed 2 milliroentgens per hour.

Every effort should be made to limit the radiation level on the roof to a radiation level of 2 milliroentgens per hour. However, construction requirements may preclude shielding the roof to meet the 2 milliroentgens per hour radiation level. Variances will be considered if the following information is provided:

- a. Means of access to the roof.
- b. Procedures for assuring that no individual is on the roof or could gain access to the roof during performance of radiography.
- c. A commitment that the roof will be posted with "Caution (or Danger) Radiation Area" signs.

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d. The steps taken to minimize radiation on the roof.

A radiation level which exceeds 100 milliroentgens per hour will not be considered acceptable since such a radiation level constitutes a high radiation area which requires special precautions such as the visible-audible signal system required by Section 34.29 of 10 CFR Part 34.

For a permanent facility, Section 34.39 of 10 CFR Part 34 requires that each entrance into the high radiation area in the facility shall have both visible and audible warnings signals to warn personnel of the presence of radiation. The visible signal must be activated by radiation whenever the source is exposed and the audible signal must be activated when an attempt is made to enter the facility when the source is exposed. The requirement for the visible-audible signal system is in addition to other measures which may be taken to prevent access into the facility such as locked doors and direct surveillance.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 106548.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely,

Original Signed By:
Francis M. Costello

Francis M. Costello
Nuclear Materials Safety Section A
Division of Radiation Safety
and Safeguards

Enclosures:

1. 10 CFR Part 34
2. Regulatory Guide 10.6

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