



August 21, 1987

United States Nuclear Regulatory Commission
Region III
799 Roosevelt Rd.
Glenellyn, IL 60137

Attention: Mr. D. G. Wiedeman
Nuclear Material Safety
Section I

Dear Sir:

This letter is in response to the "Notice of Violation" dated August 11, 1987, from the routine safety inspection conducted by Mr. D. R. Gibbons, of this facility on July 27, 1987, of activities authorized by NRC Byproduct Material License No. 34-20325-01.

Two Severity Level IV violations were noted during the inspection. Since I have just recently joined Safety-Kleen Corp. during the last month, I had to rely on information from my predecessor concerning the violations. I, however, guarantee that these violations have been or will be brought into full compliance of the regulations.

Attached you will find our reply to each violation, corrective action taken, and the date when full compliance will be achieved.

Sincerely,

Kenneth A. Baughman
Laboratory Manager

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Enclosure: Response to Notice of Violation

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RESPONSE TO NOTICE OF VIOLATION

Safety Kleen Corp.

License No. 34-20325-02

1. License Condition No. 12 limits the use, or supervision of use, of licensed material to a named individual.

Violation--Contrary to the above, the licensee allowed an individual to use licensed material during the week of July 20, 1987, and that person was not authorized by this license condition to use licensed material.

Response-- The user currently listed on the license is Miss Janet Thaman. On May 20, 1987, it was requested that her name be replaced with Mr. John Schmitz, since she is no longer employed with the company (see attached).

Receipt of our letter was acknowledged on May 27, 1987. It was assumed that upon receipt of your acknowledgement it was acceptable to begin using the detector and on July 20, 1987, the detector was tested. After the discussions with Mr. Gibbons during his inspection, we learned differently and since then no additional work has been performed with the detector.

All current projects with the detector have been placed on hold until acknowledgement of the change has been made. Upon approval by the NRC of the requested change, our facility will be in compliance.

I request expedient review of the change so as to not cause undo hardship on the laboratory, since projects requiring the use of the detector will soon become crucial.

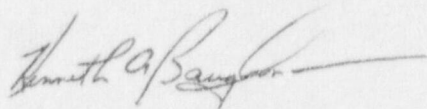
In addition, when the license is renewed, several names will be added to the license, so if one terminates employment with the company, someone else will still be listed on the license.

2. License Condition No. 13 requires that the licensee's chromatograph detector containing nickel-63 be tested for leakage and/or contamination at intervals not to exceed six months.

Violation--Contrary to the above, the licensee failed to test their chromatograph detector containing nickel-63 for contamination or leakage from June 12, 1984 to July 10, 1985 and from July 10, 1985 until May 19, 1987, intervals of more than six months.

Response-- It was the impression of the personnel during those time frames that wipe tests only needed to be performed if the unit was operated, which during those times, it was not. The wipe test was performed in May 1987 in anticipation of new testing to be performed by the laboratory.

In order to comply with this condition, wipe tests will be performed in May and November of each year. A memo has been written and posted stating this policy, and a label has been attached to the gas chromatograph stating when the next scheduled wipe test is due.

 8/21/87

Kenneth A. Baughman
Laboratory Manager

KAB/mdh