

07 DEC 28 1987
December 22, 1987

United States Nuclear Regulatory
Commission - Region II
101 Marietta Street, N.W.
Atlanta, Georgia 303323

Attention: Mr. William E. Cline, Chief

Re: Notice of Violation
(NCR Inspection Report
54-24893-01/87-01)
2

Gentlemen:

In response to your letter of December 2, 1987, we are submitting the requested reply, in accordance to 10 CFR 2.201.

Item A - Periodical Leakage Tests

We believed that the source in its first year of use, as shown in the users manual of the test gauge, did not require a six month test interval. Furthermore, the test gauge was received on April 22, 1987. Thus, we understood that the leak test performed by the manufacturer was still valid. In pursue of compliance, after the inspection of Mr. Franklin of that Division, the leak test was immediately performed.

Copy of the leak test report performed by Santiago Gomez-Figueroa on November 25, 1987 is included.

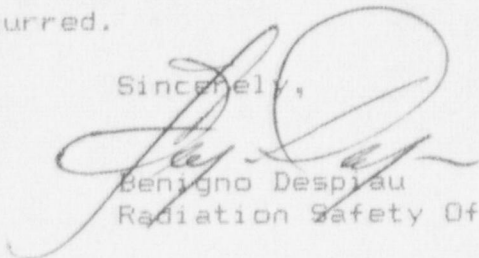
Item B. Posting of Form NRC-3

Once the Form NRC-3 was provided by the inspector, the forms were duly posted at the location that the sealed source is stored.

Furthermore, to assure that immediate compliance and a survey of facilities was performed by the Mr. Santiago Gómez-Figueroa. These findings are being submitted as an enclosure. The six-month leak tests will be performed subsequently.

We regret that these conditions occurred.

Sincerely,


Benigno Desplau
Radiation Safety Officer

BD/lr

Enclosures

SAN JUAN RACING ASSOCIATION, INC

P.O. Box 29500, 65th Infantry Station, Río Piedras, Puerto Rico 00929 - Phone: (809) 724-6060

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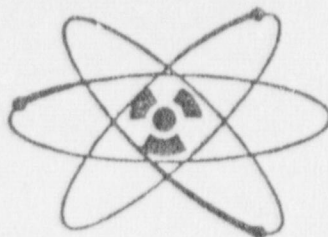
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52-24893-01

DCD

IE07

SANTIAGO GOMEZ
Radiation Physics Consultant,
NRC-License No. 52-17420-01



1821 Colonia St. - College Park
Rio Piedras, P.R. 00921
Tel. 809-751-0042

LEAK TEST CERTIFICATE

FOR

RADIOACTIVE SEALED SOURCES

ITEM TESTED:

CPN Sources: 10 mCi (Cs-137)/50 mCi (Am-241/Be
(7-28-87) - Campbell Pacific Nuclear Inc.
Model MC-1 - Serial No. M16127267

LICENSEE:

SAN JUAN RACING ASSOCIATION, Inc.
P.O. Box 29500 - 65th Infantry Sta.
Rio Piedras, P.R. 00929
NRC-License No. 52-24893-01

METHOD OF TEST:

Using filter paper or Q-tips wipe all external surfaces of the sealed source and/or the closest movable parts of the equipment where the source is contained. Then, measure the net activity on the samples in a Radiation Detection System capable of detecting less than 0.005 uCi.

STANDARD:

Cs.-137, 5.0×10^{-3} uCi (3-71)/Am-241, 5.7 uCi (6-8)

RESULTS:

The test indicated the presence of not more than 6.7×10^{-6} uCi of Cs-137/Am-241 Source in compliance with NRC Stds.: Yes No
NRC Regulations require that should any leak test reveal the presence of 0.005 uCi of removable contamination, the source must be removed from service. Next leak test due May, 1988

DATE: Nov. 25, 1987 SIGNED:



BRAINARD • KILMAN

P.O. Box 1959, 2175 West Park Ct., Stone Mountain, GA 30086
(404) 469-2720, 1-800-241-9468, TLX 54-2969

invoice

NO: 125903
DATE: April 15, 1987
JOB NO: _____
QUOTE NO: _____

SOLD TO:
SAN JUAN RACING ASSOCIATION
P.O. BOX 29500
65TH INFANTRY STATION
RIO PIEDRAS, PUERTO RICO 00929

CONSIGNED TO:
SAN JUAN RACING ASSOCIATION
HOLD & NOA 724-6060
ATTN: LOUIS SANTIAGO
RIO PIEDRAS, PUERTO RICO 00929

FORWARDED TO:
FEDERAL EXPRESS
ATLANTA, GEORGIA

Shipper Requests U.S. \$ _____ of Insurance. Date Shipped 04/15/87
Forwarder Notify: A B
Terms: NET
Shipping Terms: FEDERAL EXP

ITEM	QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
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1.	1	MC-1-82 PORTAPROBE, 8" W/2" INCREMENTS	\$	\$
INVOICE TOTAL				\$

"THIS IS TO CERTIFY THAT THE ABOVE IS OF USA MANUFACTURE/ ORIGIN." TRUE AND CORRECT.

[Signature]
EXPORT DEPARTMENT

1 BOX 3 80 LBS.

EL COMANDANTE

PAID
MAY 27 1987
CK No. 30670

RADIATION SAFETY INSPECTION REPORT

Licensee Name: San Juan Racing Association Inc.

NRC Lic.No. 52-24893-01

Location: EL COMANDANTE (Main Building)

Date: November 25, 1987

OBJECTIVE: To evaluate the current Radiation Protection Program of the facilities and produce recommendations if necessary.

FINDINGS:

1. Rooms or areas were properly posted to indicate the presence of radioactive materials.
2. Form NRC-3 "Notice to Employees" was posted in the Supervisor's Office where the CPN Unit is stored.
3. A copy of the current License and License conditions were properly posted.
4. Records of current and accumulated occupational radiation exposures of personnel were properly maintained.
5. Records of Leak Tests were not complete at the time of inspection but it is foreseen no further violation to regulations in this respect. Samples for leak test analysis were taken today
6. Results of the radiation survey performed to the storage facility and surrounds were as follows:
 - a. Contact to CPN Unit box: 4.0 mR/hr
 - b. One meter away: 0.3 mR/hr
 - c. Entrance door: 0.15 mR/hr
 - d. Outside hall: 0.05 mR/hr
 - e. Contact to hall wall: 0.2 mR/hr

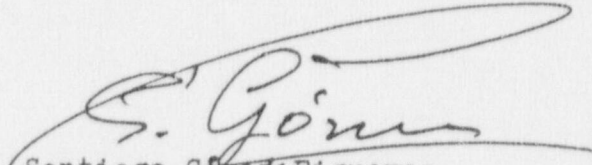
Radiation Safety Inspection Report.....continued

f. Supervisor desk: 0.05 mR/hr

g. Working table: 0.40 mR/hr

7. Radiation levels detected are satisfactory and no radiation hazard is foreseen for the personnel involved in handling the CPN Unit and for the general public.

Signed:


Santiago Gómez-Figueroa,
Radiation Physics Consultant

Date:

12/3/87

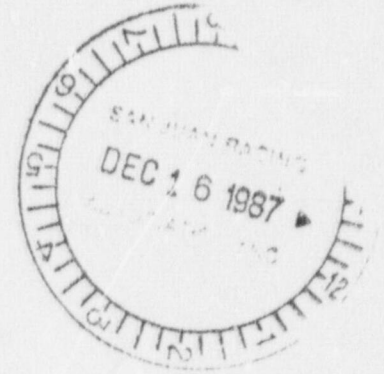


UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

DEC 02 1987

Docket No: 030-29761
License No: 52-24893-01

San Juan Racing Association, Inc.
ATTN: Mr. I. M. Tress
General Manager
P. O. Box 29500
65th Infantry Station
Rio Piedras, PR 00929



SUBJECT: NOTICE OF VIOLATION
(NRC INSPECTION REPORT 52-24893-01/87-01)

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by L. Franklin on November 18, 1987, at Nuevo El Comandante Racetrack. At the conclusion of the inspection, the findings were discussed with L. Santiago, Senior Soil Technician.

The inspection was an examination of activities conducted under your license with respect to radiation safety and compliance with NRC regulations and the conditions of your license. It included selective examinations of procedures and representative records, interviews with personnel, and direct observations by the inspector.

The inspection findings indicate that certain activities appeared to violate NRC requirements. The violations, references to pertinent requirements, and elements to be included in your response are described in the enclosed Notice of Violation.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and its enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,

William E. Cline, Chief
Nuclear Materials Safety and
Safeguards Branch
Division of Radiation Safety
and Safeguards

Enclosure:
Notice of Violation

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1/2