



A NONPROFIT AGENCY

May 1, 1989

Mr. John R. White
Chief
Nuclear Materials Safety Section C
Division of Radiation Safety and Safeguards
Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

License No. 37-16043-01
Routine Inspection No. 030-10265/89-001

Dear Mr. White:

This is in response to your letter dated April 19, 1989, regarding the above mentioned routine safety inspection conducted by Ms. Marlene Taylor at ECRI on March 10, 1989. We have implemented a number of corrective actions which have brought us into full compliance with the standards established by the Nuclear Regulatory Commission pursuant to Title 10 of the Code of Federal Regulations. These corrective actions are fully described below.

- A. Strontium-90 and 50 nanocurie americium-241 sources. These sources are currently being stored in individual shielded cases within a box that has been riveted to the inside of a storage cabinet. A two-key security system is in place: one key for the storage cabinet and another for the box. The former key is under the constant control of our chief technician, who is responsible for managing the stockroom in which the sources are being stored. The latter key is under the constant control of our radiation safety officer.

We maintain a set of master keys, which are located in a locked cabinet. Our plant supervisor is the only employee who has access to the master key cabinet. However, he does not know which key opens the stockroom cabinet.

We have developed written procedures that prevent unauthorized removal of the sources and ensure proper surveillance and control. The procedures require that the radiation safety officer must approve all uses of the sources and ensure that the sources are properly returned to the locked box. The nature and date of all source uses will be documented by the radiation safety officer. Semi-annual checks will be performed and documented by our radiation safety officer to ensure that the sources are properly stored. As a result of these actions, we believe that the sources are secure from unauthorized removal from

May 1, 1989
Mr. John R. White
Chief
Nuclear Materials Safety Section C
Division of Radiation Safety and Safeguards
Nuclear Regulatory Commission
Page 2

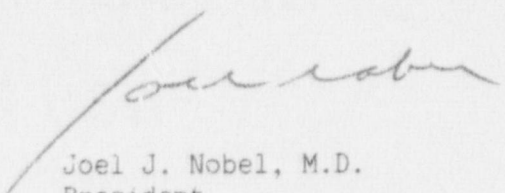
the storage location and that ECRI is in full compliance with 10 CFR Section 20.207 as of this date.

- B. Leak testing of gas chromatograph. The gas chromatograph is currently in storage and out of operation. We have ordered a leak test kit (Part No. 18713-60050) from Nuclear Radiation Developments Inc., 2937 Alt Boulevard, Grand Island, NY 14072, and will perform the leak test in accordance with instructions specified by Hewlett-Packard, the manufacturer of the gas chromatograph. A copy of the leak test instructions is attached hereto as Appendix A. The wipe samples will be submitted for analysis to the above mentioned company. Our director of industrial hygiene has been assigned responsibility for completing this task, as well as ensuring that the device is tested at intervals not to exceed six months. Documentation of test methods, test results, dates of performance, and the names of persons performing those tasks will be maintained for one year after the next required leak test is performed, in accordance with 10 CFR Section 31.5 (c)(4).

We anticipate that the leak test will be completed in three weeks. At that time, we will be in full compliance with the requirements of 10 CFR 31.5 (c)(2).

We believe that the corrective actions outlined above will help to ensure the safe storage and handling of licensed materials, as well as remedy all violations noted in your letter of April 19. Please feel free to contact me with your concerns or comments.

Sincerely,



Joel J. Nobel, M.D.
President

JJN/sg
081206
Enclosure

cc: Dr. R. Spooner, ECRI