



# JONES & LAUGHLIN STEEL CORPORATION

ALIQUIPPA WORKS DIVISION

**ALIQUIPPA, PA.**

GENERAL OFFICES  
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November 12, 1963

Mr. Robert W. Kirkman  
Region I, Division of Compliance  
U. S. AEC  
376 Hudson Street  
New York, New York 10014

Re: CO:I:EPR

Dear Mr. Kirkman:

Reference is made to your letter of October 18, 1963, relative to the inspection of our use of Byproduct Materials at our Aliquippa Works. First let me say that we appreciate Mr. Resner's efforts to call our attention to certain requirements of the AEC's Regulations governing the use of licensed materials.

On November 5, 1963, we discussed the results of Mr. Resner's survey together with your letter at a meeting with our Industrial Hygiene Engineer, Mr. John Janous, and our Health Physics Consultant, Mr. R. G. Gallagher of Applied Health Physics, Inc. Mr. Gallagher was requested to make a thorough survey of our radioisotope operations and to submit an appropriate report. As you know, he has at our request contacted you and requested an extension of the reporting date relative to the noncompliance items contained in your letter. This was done to permit him to review the content of your letter and to take such action as may be required to obtain full compliance. As a result of our meeting and the radiological safety survey, we submit the following information relative to the five points mentioned in your letter.

(a) We admit noncompliance with the requirements of 10-CFR-20.203 (f) (i), concerning radiation labels. Appropriate labels were attached to all gages on November 5. The labels, "Radiation-Hazard" that were on the gages at the time of the inspection have been removed and destroyed. Thus, we believe we are in full compliance with this requirement of the regulations.

(b) We admit violation of License Condition 8A relative to the maximum amount of Sr-90 in our possession. We are preparing an amendment to our Byproduct Material License No. 37-2567-1 that will permit us to possess that amount of

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byproduct materials necessary to have replacements for our density gages. That is, we wish to be authorized to have a maximum of 140 millicuries of Sr-90 at any one time in our possession. At the present time, we are within the currently authorized amounts of Sr-90.

(c) We do not feel that the exchanges cited in this item were in noncompliance with our license. In our original and subsequent licenses, reference is made to the "Model F device." The Model F device consists of the density gage proper which contains the Sr-90 source in a holder together with associated electronic circuitry. Circuitry is also partially housed in a cabinet eight to ten feet from the gage.

In our interpretation of our license, we did not and do not now feel that it was the intent of the AEC to prohibit routine maintenance and adjustment of the circuitry servicing the gage. We also do not feel that removal and change of the source holder from the Model F device is contrary to our license in that the source has never been disturbed and the exchange has always been performed with the source container in a locked position. Leak testing has been performed by General Electric on an exchange basis as required by our license. It is also our understanding that this procedure is in conformity to the license granted General Electric for use of these materials.

(d) We also feel that we are in compliance with our license in regard to this item. At no time have our personnel performed any repairs or adjustments involving the sealed sources and specifically nothing was done relative to the Kr-85 source that would be in violation of the conditions of our license. The maintenance that was performed on this gage did not involve work on the sealed source and therefore, we believe we are within the terms and conditions of our license. The work that was performed was by our trained maintenance personnel and involved repairs only to instrument circuitry in the same manner that they would repair any other instrument or machine operated by this company. Such repairs were made with the source shielded and did not involve radiation exposure to our personnel.

(e) We admit this item of noncompliance concerning leak testing of sealed sources at intervals not to exceed 6

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months. However, we will be submitting a request for an amendment to our Byproduct Materials license which will permit us to obtain periodic samples for the leak testing of these sources using an approved and licensed leak test service. All sealed sources have been leak tested and are now in full compliance with the provisions of our License Condition 17 (A).

On November 7, 1963, a representative of Industrial Nucleonics together with our Industrial Hygiene Engineer, John Janous, packaged the 250 mc Cs-137 source for shipment back to Industrial Nucleonics. This source will be shipped upon receipt of the results of the leak test which has been performed by their representative.

We have requested Applied Health Physics, Inc., to furnish us with a proposal relative to their presenting appropriate radiological safety training that will facilitate our utilization of these byproduct materials.

We trust that the explanation given above will be satisfactory and indicative of this company's desire to be in full compliance with all provisions of our license and AEC regulations. However, if it is ultimately decided that our interpretation of our license is incorrect, we respectfully request sufficient time and assistance from your organization to enable us to secure the necessary training of personnel and revision of our license to bring our operation into full compliance.

Please do not hesitate to contact me or our Industrial Hygiene Engineer, or our Health Physics Consultant if we can be of any service.

Very truly yours,

*A. E. Keller* LRO  
Works Manager

jdp