

# HARREL

The Hi-tech Extrusion Systems People

## Harrel, Incorporated

16 Fitch St., E. Norwalk, CT 06855 USA Tel: (203) 866-2573 Fax: (203) 866-1483  
World Wide Web: <http://www.harrel.com> • E Mail: [info@harrel.com](mailto:info@harrel.com)

August 31, 2005

Docket No. 03011491

License no. 06699-01

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk,  
Washington, D.C. 20555

Subject: Reply to a Notice of Violation

A: 10 CFR 20.1101(c) requires that a licensee review its radiation protection program content and implementation at least annually.

For the past several years, until now, the licensee was totally inactive in the nuclear field. No nuclear devices have been sold since before the last review, and nothing was done that could possibly cause a dangerous situation. Nevertheless, this review should have been done, and it was not.

**CORRECTIVE ACTION:** This review has now been completed, and a prominently marked notebook has been created with sections outlining the action to be taken. This notebook will be prominently kept in the office of the RSO. A procedure has been instituted whereby the actions outlined in this notebook will be carried out some time during the month of August every year.

B. Condition 18 of License No. 06-16699-01 requires that the licensee conduct a physical inventory every six months to account for all sources received and possessed under the license.

The system at Harrel maintains a running inventory that provides information as to the total activity on hand, but this system does not physically account for individual sources.

**CORRECTIVE ACTION:** A section has been created in the notebook described above, which lists the status of each individual source in the Harrel inventory and its location. Totals, are, of course, still maintained. The status of each source will be verified in August and February of every year.

IE07

C. Condition 16. D. of License no 06-16999-01 requires that no sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

The sources used here are Americium 241, which has a half-life in excess of 100 years. All sources are contained in tightly closed, sealed housings. All sources are used in tungsten recesses with tungsten on three sides and aluminum on the fourth. Sources are never moved, except in their housings. It is inconceivable to us that leakage or contamination could occur.

**CORRECTIVE ACTION:** However, in accordance with the instructions, a wipe test was conducted on each source over 10 years old in our inventory. No leakage or contamination was found, but the status of each source was recorded in the notebook listed above. Each source will be re-examined at least once every 10 years, and the results will be recorded in the notebook.

The delay in responding to your notice was partially due to the fact that our facility was on its annual vacation shutdown for 2 weeks. We then had a complete failure of our telephone system, which occupied our technical people fully, and this week we have a set of visitors who are spending every day this week from 8 to 6 running tests. It has been quite a rat-race!

Please let us know if further information is desired.

Very best regards,



Holton E. Harris  
Radiation Safety Officer

Copy: Regional Administrator, Region 1  
U.S. Nuclear Regulatory Commission

