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June 14, 1985

Gary G. Zech, Chief
Vendor Program Branch
Office of Inspection and Enforcement
United States Nuclear Regulatory
Commission
Washington, D.C. 20555

Re: Robert-James Sales, Inc./Docket No. 99901002/85-01

Dear Mr. Zech:

This letter is in response to the Notice of Violation and your cover letter dated May 9, 1985 concerning the inspection conducted by Mr. James T. Conway of the NRC at the premises of Robert-James Sales, Inc. (the "Corporation") on March 25-28, 1985. Your letter requested that the Corporation submit to the NRC within 30 days of the date of your letter a written statement containing (1) a description of steps that have been or will be taken to correct the deficiencies stated in the Notice of Violation; (2) a description of steps that have been or will be taken to prevent recurrence; and (3) the dates the Corporation's corrective actions and preventive measures were or will be completed.

In my letter to Mr. Conway dated May 17, 1985, I requested, on behalf of the Corporation, an extension of time to respond on behalf of the Corporation, so that this response would not be due until June 15, 1985.

By letter dated June 3, 1985, I advised you, on behalf of the Corporation, that the Corporation sought withholding of proprietary information set forth in the NRC's inspection report no. 99901002/85-01. I have not yet received a response to that request and anticipate that the inspection report will not be released for public inspection until the issues raised in the request are addressed.

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99901002 PDR

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The Notice of Violation states three Severity Level V violations. Those violations, and the actions that have been or will be taken to correct them and prevent recurrence, are as follows:

1. Copies of 10 CFR Part 21 and §206 of the Energy Reorganization Act were not posted.

Remedial Action: A copy of 10 CFR Part 21, as provided by Mr. Conway to management of the Corporation, was posted on the employee bulletin board on the premises of the Corporation on or about the first day of the inspection. A copy of §206 of the Federal Energy Reorganization Act was obtained by the Corporation and posted on its employee bulletin board on or about May 21, 1985.

2. Appropriate procedures to evaluate deviations or inform the licensee or purchaser of the deviation did not exist.

Remedial Action: On March 4, 1985, the President of the Corporation conferred with counsel to review the Notice of Violation, the applicable notification, inspection and quality control requirements of 10 CFR Part 21, the existing quality control manual and procedures employed by the Corporation, and methods by which the quality control manual and procedures of the Corporation could be modified to respond to the Notice of Violation. Mr. Conway of the NRC was contacted by telephone to obtain NRC guides on amendments to the Corporation's quality control manual and quality control procedures. Counsel to the Corporation is presently engaged in drafting amendments to the quality control manual, and recommended procedures for handling nuclear-related orders, which will be submitted to the NRC for review and, if acceptable, entered in the quality control manual and posted on the employee bulletin board on the premises of the Corporation. An inter-office memorandum will also be circulated concerning the amendment to the quality control manual and to the changes in procedure. It is anticipated that the documentary material pertaining to the foregoing will be submitted to the NRC for its review within ten days of the date of this letter.

3. Omission of 10 CFR Part 21 legend from some nuclear-related orders.

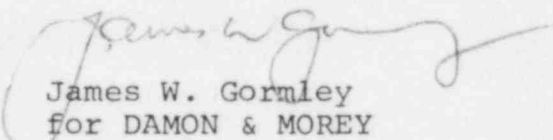
Remedial Action: The Corporation presently has in place a procedure for special handling of nuclear-related orders. This procedure will be amended and restated in an inter-office memorandum to be distributed to the Corporation's employees, and posted on its employee bulletin board, following its submission to the NRC for

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its review. The inter-office memorandum will be submitted to the NRC together with the amendments to the quality control manual pertaining to evaluation of deviations. It is anticipated that this submission will be made in about ten days from the date of this letter.

Please feel free to contact me if you have any questions or comments.

Very truly yours,



James W. Gormley
for DAMON & MOREY

mlf

cc: Mr. James W. Bokor
Mr. James T. Conway