

Amersham Corporation
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Telephone (617) 272-2000

December 9, 1992

Mr. Francis Costello, Chief
Industrial Application Section
Division of Radiation Safety and Safeguards
US Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Costello;

We have received a copy of inspection report Nos. 030-29300/92-001, 030-32596/92-001 and 040-08917/92-001.

We would like to clarify a couple of inaccuracies that appear in the inspection report.

1. The facility manager is William McDaniel
2. Lab supervisor is Edward Shaffer
3. On page 11 it states that area monitors are calibrated annually. These are inspected during the monthly audits to assure they are operational, and are activated approximately once a year for a radiation drill.
4. On page 6 of the inspection report it states that the radiological technician are reaudited; while we have proposed this policy it has not been completely implemented. The inspectors may have been reviewing records on the actual qualification reviews performed on the technician.

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As stated in your letter, the following actions will be addressed and completed by 31 January 1993.

1. We will review inventory records (this includes the sheets on sealed sources) to assure that all sources have the appropriate records to indicate disposal or transfer.
2. Leak testing of sources greater than 10 years in storage will be performed and documented.

The following item referring to our calibration area requires some clarification based upon our understanding at the exit interview.

3. The calibration area is currently located at our radioisotope laboratory outside of the cobalt room and range room. Typical background levels can be 0.2mR/hr, if the levels exceed this the device/source adding to the background is relocated prior to calibrations being performed. In addition the background levels are subtracted from the readings obtained to give a true radiation reading.

We do not perform calibrations of low scale readings ie 0.1 - 1.0 mR/hr within this calibration area. Meters calibrated in this area typically have a scale capable of reading from 2mR/hr to 1000mR/hr (industrial radiography survey instruments). As a result we do not feel that the low background levels significantly affect the calibration of the meter.

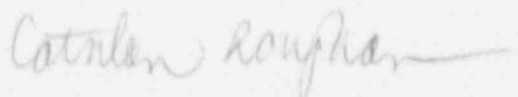
We are considering having the calibration outside of the radioisotope laboratory in order to reduce the operators exposure. This will be performed in accordance with our new process form as required by our Radiation Safety Manual. This will be completed in accordance with a schedule established by the RPGSC.

Please advise if this action will meet the intent of your recommendation.

The notice of violation issued concerned the nonperformance of one of our required monthly audits. Amersham has had an excellent record in performing all the required license commitments, including the monthly audits. We did not perform the actual physical audit ie wipe tests and radiation surveys as cited in the NOV, however the required records audit was performed. In addition the routine daily contamination wipes and radiation surveys performed in the radioisotope laboratory during this time period did not indicate any unusual results. Amersham will continue to maintain its good safety record by performing the monthly audits as required on a monthly basis. As noted in your inspection report, Amersham has hired a full time QA Manager which will allow the safety office to appropriately focus more attention on radiation safety issues. This will assure that license commitments are met as required.

I trust this contains the information necessary to address your inspection findings. If you require any additional information, please contact me.

Sincerely,



Cathleen Roughan
Regulatory Affairs Manager

cc: W. McDaniel, Facility Manager