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L. ROBERT KIMBALL & ASSOCIATES

CONSULTING ENGINEERS & ARCHITECTS

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TELEX NO. 510-694-8028

1979 OCT 11 PM 2 59

October 5, 1979

U.S. NUCLEAR REGULATORY COMMISSION
Mr. James A. Jones
United States Nuclear Regulatory Commission
Material Licensing Branch
Division of Fuel Cycle and Material Safety
Washington, D.C. 20555

Re: Mail Control 00584

Dear Mr. Jones:

This letter is in reference to your request for additional information and clarification regarding the following:

1. Written instructions for employees to follow in operating the devices, securing the devices, transporting the devices, and actions to take in emergency situations.
2. Model number of leak test kit to be used to collect leak test samples.

Enclosed please find information concerning item number 1. The leak test model number is (Troxler Model 3880) for Seal Radioactive Sources.

I hope this information will aid you in your review of our application dated June 14, 1979. If you require additional information or clarification please feel free to contact us at anytime.

Sincerely,

L. ROBERT KIMBALL & ASSOCIATES

Oscar T. McConnell
Oscar T. McConnell
Radiation Safety Officer

Enclosure

OTM/dmh

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HANDLING PROCEDURES

A. Operation

The Troxler instruments were designed with operator safety as a prime consideration; however, as with any piece of potentially hazardous equipment, some general precautions should be observed.

1. Do not operate or attempt to operate the instrument unless you have been authorized to do.
2. Keep the source position in the "SAFE" or stored position when not in use.
3. Wear a film badge when using or transporting the instrument.
4. While exposure dose levels are well within limits for radiation workers, never expose yourself to the bare source without sufficient reason for justification of the additional dose.
5. Keep all unauthorized persons out of the operating area. A suggested distance is 5 meters or 15 feet. The general public must not be unnecessarily exposed to radiation.
6. Maintain security of the instrument at all times.
7. Insure that the gauge has had leak tests performed at the intervals required by your Radioactive Materials License.
8. If you have any doubts about use of the instrument, ASK. Your Radiological Safety Officer either has the answer or can obtain one.

B. Security

1. The source lock should be in place when not in use and the instrument should be kept in a locked vehicle when transported. When stored, the area should be locked. Not only is it an expensive piece of equipment but, if stolen, could be abandoned under conditions which could be hazardous.

C. Transporting the Device

1. No personnel may transport or use the nuclear gauges unless the individual has been approved by the radiological safety officer and the requirements of these procedures are met.
2. The lock should be in place and the container placed in a portion of the vehicle which can be locked. When not in transit the equipment should be stored in a secured area.
3. The device maynot be stored less than 30 centimeters from passengers.

D. Emergency Procedures

1. In the event of physical damage to a gauge, a six (6) feet radius exclusion area should be maintained until the extent of source damage (if any) is determined. If a vehicle is involved, it must be stopped and remain stopped until the extent of contamination hazard (if any) is determined. If visual examination of the instrument and source indicates damage to the source, including fracture of the weld, the appropriate authorities and Troxler Electronic Laboratories, Inc. should be notified. The instrument may be removed from the site by using a shovel or other long handled instrument and placed in a suitable container such as a metal drum. Provisions should be made to have the site surveyed for possible contamination after the instrument is removed. Disposition by the factory, as covered later, could be arranged after a leak test had been performed to determine the integrity of the source before shipment back to the factory.
2. Immediate telephone notification must be made to the following in the event of accident (1 above) or the loss of a sealed source, whether accidental or due to theft.
 - a. Company Radiological Safety Officer
 - b. NRC Regional Office if applicable
 - c. State Health Department
Radiological protection division if applicable
 - d. Local Authorities
Fire Dept., sherrif, police, state highway patrol, if necessary
 - e. Troxler Electronic Laboratories, if necessary.

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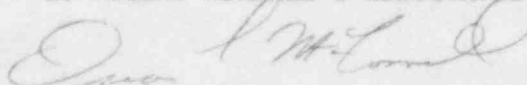
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