

ETHICON

INC.

SOMERVILLE · NEW JERSEY 08876

August 26, 1974

Mr. Paul R. Nelson, Chief
Radiological & Environmental
Protection Branch
U. S. Atomic Energy Commission
Directorate of Regulatory Operations
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Nelson:

SUBJECT: ETHICON, INC. - AEC LICENSE NO. 29-02786-03
 AEC LICENSE NO. 29-02786-06
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In reply to your letter of the 7th of August notifying ETHICON, INC. of an apparent violation of an AEC requirement, a written statement of explanation and corrective steps which have been or will be taken as itemized in your letter is as follows:

- (1) Corrective steps which have been or will be taken, and the results achieved.

Counting and recording of the "swabs" taken from the exterior surfaces of the drums.

NOTE: The drums were swabbed and subjected to count in the inspector's presence. The results were less than 30 dpm (disintegrations per minute). This is within the allowable limit (2200 dpm/min./100 cm²). A copy of the record is attached (Exhibit 1).

Measurements for radioactivity at three feet will be taken and recorded.

NOTE: Measurement for radioactivity at three feet was also taken at the same time. This is an exercise only in our situation because the contents and quantity of the waste were known, were documented, and emit no radioactivity beyond the thickness of the drums. Radioactive hydrogen-3 and carbon-14 are "beta-emitters". A thin sheet of aluminum foil is sufficient to contain beta-emitters.

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PDR FOIA
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August 26, 1974

A tag or stencil with the wording "Radioactive - LSA" shipped for disposal when appropriate. This will be done for "low specific activity" material (LSA), otherwise a DOT label will be applied.

No shipment of waste materials have been made since July 24 but the above procedures will be followed.

NOTE: The DOT label was not applied for two reasons. First, we did not know this was required for our low quantity and secondly, the waste disposal service (TELEDYNE ISOTOPEs) never required these labels from us. Subsequent contact with Mr. D. R. Furhman of TELEDYNE confirmed it was their responsibility to apply these labels if the contents warranted the action. The shipping tag supplied to TELEDYNE showed that the contained quantities were less than specified for the application of the DOT labels. A copy of the shipping papers is attached (Exhibit 2).

- (2) Corrective steps which will be taken to avoid further violations.

A review of the procedure was made with all parties concerned by the Radiation Safety Officer.

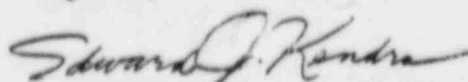
- (3) The date when full compliance will be achieved.

As soon as the next waste disposal service is implemented and then henceforth scheduled for sometime early September.

For License No. 29-02786-03 (no violation), you are correct in understanding that the leak testing program has been supplemented with a program of water analysis and with surveys of the resin bed and exhaust air filters. The amended version of the Instruction Manual has not yet been received from AECL at this date. As soon as it arrives, it will be sent to the Directorate of Licensing.

We trust that all of the above will meet with your approval.

Regards,



Edward J. Kendra
Manager, Technical Services
Radiation Safety Officer

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Attachment

cc: Mr. J. A. Cormack

EXHIBIT 1

[illegible]

TELEDYNE
ISOTOPES

50 VAN BUREN AVENUE • WESTWOOD, NEW JERSEY 07675
TELEPHONE 201-664-7070

CUSTOMER NUMBER

7	8	9	10	11
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DATE

7	24	74
MO. 12-13	DAY 14-15	YEAR 16-17

No. 22352

1-6

COMPANY/INSTITUTION

Ethicon Inc.

Margorie McTernan

CONTAINER NUMBER

	CONTAINER				CRATE	LEAK TEST	INSTR. CAL.		OTHER	IF CRATE, CU. FT. IF OTHER, DESCRIBE
	5 GAL.	30 GAL.	30 S/P	55 GAL.						
45789	18 <input checked="" type="checkbox"/>	2	3	4	5	6	7	8	9	
48008	19 <input checked="" type="checkbox"/>	2	3	4	5	6	7	8	9	
	20 <input checked="" type="checkbox"/>	2	3	4	5	6	7	8	9	
45790	21 <input type="checkbox"/>	<input checked="" type="checkbox"/>	3	4	5	6	7	8	9	
45786	22 <input type="checkbox"/>	<input checked="" type="checkbox"/>	3	4	5	6	7	8	9	
45787	23 <input type="checkbox"/>	2	3	4	5	6	7	8	<input checked="" type="checkbox"/>	<i>poly poly poly</i>
48006	24 <input type="checkbox"/>	2	3	4	5	6	7	8	<input checked="" type="checkbox"/>	
48007	25 <input type="checkbox"/>	2	3	4	5	6	7	8	<input checked="" type="checkbox"/>	
	26 <input type="checkbox"/>	2	3	4	5	6	7	8	9	
	27 <input type="checkbox"/>	2	3	4	5	6	7	8	9	
	28 <input type="checkbox"/>	2	3	4	5	6	7	8	9	
	29 <input type="checkbox"/>	2	3	4	5	6	7	8	9	
DELIVERED	<input type="checkbox"/>	30 <input type="checkbox"/>	32 <input type="checkbox"/>	34 <input type="checkbox"/>	36 <input type="checkbox"/>	38 <input type="checkbox"/>		40 <input type="checkbox"/>	42 <input type="checkbox"/>	

ISOTOPES REP.

Chris Johannessen

CUSTOMER REP.

Margorie McTernan

ISOTOPE	AMOUNT	ISOTOPE	AMOUNT	ISOTOPE	AMOUNT	ISOTOPE	AMOUNT
<i>H³</i>	<i>21.137 mCi</i>						
<i>C¹⁴</i>	<i>.140 mCi</i>						

INSTRUMENT

E-120

THIS IS A RADIOACTIVE WASTE DISPOSAL RECORD

EXHIBIT 2