



CONVERSION SYSTEMS, INC.

115 Gibraltar Road, Horsham, PA 19044 (215) 441-5910 • TWX 510-665-6746

April 12, 1985

Mr. John D. Kinneman, Chief
Nuclear Materials Safety Section A
Nuclear Materials Safety & Safeguards Branch
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: License No. 37-19293-01; Docket No. 030-17280

Dear Mr. Kinneman:

In accordance with the requirement of CFR 2.201 Conversion Systems, Inc. is responding with an explanation for the violations noted in Inspection 85-01.

NRC Policy 10 CFR 2 Appendix C, Violation A - Condition 12

Corrective measures have already been taken to insure compliance with our present materials license. The attached letter from Conversion Systems, Inc. to USNRC on January 7, 1985 documents our permit modification. Amendments made in this permit include the names of the individuals presently using the equipment. Hard-bound lab notebooks will be kept for all data generated by our gas chromatograph (GC). This notebook will include the analyst's signature on each page providing documentation for Condition 12 of our permit.

NRC Policy 10 CFR 2 Appendix C, Violation B - Condition 14

It has been our intent to monitor contamination and/or leakage from the cell on a regular six (6) month basis as required by Condition 14. As noted in your violation notice twice during the first five years of operation the leak test exceeded the time period by two and three months respectively. Conversion Systems, Inc. has been in compliance since February 1, 1984. In order to insure future compliance the GC analyst will keep a dated record of when the wipe test is due on the top cover of the instrument near the Nickle-63 cell. In addition, a record will be kept in a hard-bound lab notebook of the date of the wipe test and the results received.

These measures are in effect immediately.

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REQ1 LIC30
37-19293-01 PDR

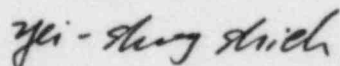
License No. 37-19293-01
Docket No. 030-17280

April 12, 1985

Page Two

We regret that Conversion Systems, Inc. did not meet total compliance with all provision of our materials license, but are confident that the ammendments already offered and provision stated in this letter will insure compliance in the future.

Sincerely,

A handwritten signature in cursive script, reading "Yei-Shong Shieh".

Yei-Shong Shieh
Director
Technical Services

/vg

Enclosure



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

APR 01 1985

Docket No. 030-17280

License No. 37-19293-01

IU Conversion Systems, Inc.
ATTN: Mr. Yei Shong Shieh
Director, Technical Services
115 Gibraltar Road
Horsham, Pennsylvania 18914

RECEIVED

APR - 8 1985

TECHNOLOGY DEPT.

Gentlemen:

Subject: Inspection No. 85-01

This refers to the routine safety inspection conducted by Mrs. Marlene J. Taylor of this office on January 21, 1985 of activities authorized by NRC License No. 37-19293-01 and to the discussions of our findings held by Mrs. Taylor with Mr. D. Alff and Mr. W. Freeman of your staff at the conclusion of the inspection.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These violations have been categorized by severity level in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register Notice (49 FR 8583) dated March 8, 1984. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us in this matter is appreciated.

Sincerely,

John D. Kinneman, Chief
Nuclear Materials Safety Section A
Nuclear Materials Safety and
Safeguards Branch

850405-0250 1p.



CONVERSION SYSTEMS, INC.

115 Gibraltar Road, Horsham, PA 19044 (215) 441-5910 • TWX 510-665-6746

January 7, 1985

U. S. Nuclear Regulatory Commission
Material Licensing Branch
Division of Fuel Cycle and Material Safety
Washington, D. C. 20555

Gentlemen:

By copy of this letter, Conversion Systems, Inc. is requesting a five year renewal of our current USNRC materials license issued on March 3, 1980. We wish to continue to operate under our current license #37-19293-01.

Renewal fee of \$110.00 is enclosed.

Program conditions will remain the same with the following amendments:

Licensee: Conversion Systems, Inc.
115 Gibraltar Road
Horsham, PA 19044

12. License material shall be used by or under the supervision of David Alff, Pamela Watkins or William Freeman.

If there are any question concerning this renewal application please contact Mr. David Alff at this location (215)441-5900.

Sincerely,

Yei-Shong Shieh
Director
Technical Services

/vg

Attachments (Duplicates)

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lp,

U. S. NUCLEAR REGULATORY COMMISSION
MATERIALS LICENSE

This Copy Is For Your Files

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter 1, Parts 30, 31, 32, 33, 34, 35, 36, 40 and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s); and to import such byproduct and source material. This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee		
1. IU Conversion Systems, Inc.		3. License number 37-19293-01
2. 115 Gibraltar Road Horsham, Pennsylvania 18914		4. Expiration date February 28, 1985
		5. Docket or Reference No.
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Nickel 63	A. Plated sources contained in Hewlett Packard Model 19303 detector cells	A. Not to exceed 15 milli- curies per source
9. Authorized use		
A. For use in gas chromatographs for sample analysis.		

CONDITIONS

10. Licensed material shall be used only at the licensee's address stated in Item 2 above.
11. The licensee shall comply with the provisions of Title 10, Chapter 1, Code of Federal Regulations, Part 19, "Notices, Instructions and Reports to Workers; Inspections" and Part 20, "Standards for Protection Against Radiation."
12. Licensed material shall be used by, or under the supervision of, Kathryn K. Wahl, Ted Berk, or David Moteles.

DJE
8504360258

MATERIALS LICENSE

Supplementary Sheet

License Number 37-19293-01

CONDITIONS

Docket or

Reference No. _____

(continued)

13. In lieu of using the conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203(a)(1), Title 10, Code of Federal Regulations, Part 20, the licensee is hereby authorized to label detector cells and cell baths, containing licensed material and used in gas chromatography devices, with conspicuously etched or stamped radiation caution symbols without a color requirement.
14. A. Each chromatograph detector containing Nickel 63 shall be tested for leakage and/or contamination at intervals not to exceed six months. In the absence of a certificate from a transferor indicating that a test has been made within six months prior to the transfer, a detector received from another person shall not be put into use until tested.
- B. The test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. The test sample shall be taken from the surfaces of the device in which the foil is mounted or stored on which one might expect contamination to accumulate. Records of leak test results shall be kept in units of microcuries and maintained for inspection by the Commission.
- C. If the test reveals the presence of 0.005 microcurie or more of removable contamination, the licensee shall immediately withdraw the foil from use and shall cause it to be decontaminated and repaired or to be disposed of in accordance with Commission regulations. A report shall be filed within 5 days of the test with Region I, Office of Inspection and Enforcement, USNRC, 631 Park Avenue, King of Prussia, Pennsylvania 19406, describing the equipment involved, the test results, and the corrective action taken.
- D. Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically authorized by the Commission or an Agreement State to perform such services.
15. Detector cells containing licensed material shall not be opened or the foil sources removed from the detector cell by the licensee.
16. The licensee shall conduct a physical inventory every six (6) months to account for all plated sources received and possessed under the license. The records of the inventories shall be maintained for two (2) years from the date of the inventory for inspection by the Commission, and shall include the quantities and kinds of byproduct material, location of plated sources, and the date of the inventory.

MATERIALS LICENSE

Supplementary Sheet

License Number 37-19293-01

Docket or

Reference No. _____

(continued)

17. Except as specifically provided otherwise by this license, the licensee shall possess and use licensed material described in Items 6, 7, and 8 of this license in accordance with statements, representations, and procedures contained in application dated January 24, 1980. The Nuclear Regulatory Commission's regulations shall govern the licensee's statements in applications or letters, unless the statements are more restrictive than the regulations.

MAR 03 1980

Date _____

For the U. S. Nuclear Regulatory Commission

Nathan Gassman
by Material Licensing Branch

Division of Fuel Cycle and
Material Safety
Washington, D.C. 20555