



Tracerco

October 21, 1996

U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, D.C. 20555

Tracerco

Suite 200
1100 Hercules
Houston, TX 77058
Telephone (713) 488-0039
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RE: REPLY TO NOTICE OF VIOLATION - DOCKET NO. 15000042

Dear Sirs,

I have reviewed the circumstances around the issuance of the Notice of Violation by the NRC Inspector on July 19 and 24, 1996 and agree that Tracerco personnel failed to follow the requirements of the regulations regarding temporary storage areas.

It happens that Tracerco had to submit an application to the State of Texas, Department of Health, Bureau of Radiation Control by October 10, 1996. One of the requirements was that Tracerco develop a Radiation Protection Program. Paragraph 302.(b) addresses this issue. A copy of the appropriate page is attached. During our monthly safety meeting, held on October 15, 1996, we reviewed our standard operating procedures and highlighted the changes and additions due to the requirement that we develop the Radiation Protection Program. We also discussed the circumstances of the NRC violation and how the personnel failed to follow the regulations. I would not expect any further violations.

If you require any additional information, please contact me.

Sincerely,

Dave Ferguson
Radiation Safety Officer

cc:

Regional Administrator, Region I

Geoff Silverburg, RSO
Star Enterprise
2000 Wrangle Hill Road
Delaware City, Delaware 19706

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PDR STPRG ESGTX
PDR

Unit of ICI Americas Inc.

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RADIATION PROTECTION PROGRAM

from an external source does not exceed .002 rem/hr. If members of the public are permitted access to restricted areas, their yearly exposure still cannot exceed 0.1 rem per year.

302. Compliance with Dose Limits for Individual Members of the Public

(a) For any sealed source work in which the source will be under the direct control of an authorized person, (i.e., the source is used in a hand held collimator or device and the 2 mR/hr boundary is no more than 4 feet from the source), the work site is not required to be barricaded. Tracerco personnel shall ensure that members of the public do not stay within a 2 mR/hr or greater dose rate field long enough to receive a 2 mR dose.

(b) For work with sources of radiation other than hand held devices, Tracerco personnel shall demarcate temporary work and storage areas with barriers or rope on which warning notices are printed or affixed bearing the radiation symbol and the words "Caution: Radiation Area Do Not Enter" which can easily be read by persons approaching the area. Position of the barriers or rope shall be such that, by direct monitoring or calculation, the dose rate outside the barrier can be shown to be below an exposure rate of 2 mR per hour.

(c) For releases of gaseous or liquid radioactive material into effluent streams either in or leading to unrestricted areas, an authorized person shall plan the release to ensure that either the final concentration of radiotracer for unrestricted areas, as specified in the regulations, is attained, or the final concentration of radiotracer does not exceed that defined by license conditions. A record of each radiotracer release shall be maintained in the Tracerco Unsealed RAM Log and a disposal calculation shall be documented on the Tracerco Radiation Safety Analysis form, which shall be filed with the Tracerco Unsealed Radioactive Material Record.

(d) Any requirement to discharge liquid or gaseous radiotracer which will produce a final concentration in excess of that permitted by the regulations or by the license, shall be referred at the planning stage to the RSO. If consideration shows that storage in isolation (to allow decay to reduce the concentration) or the use of auxiliary dilution will not be practical and that an immediate disposal will be more desirable, an application shall be made by the RSO to the appropriate regulatory agency

SURVEYS AND MONITORING