THE PROCTER & GAMBLE MANUFACTURING COMPANY

P. O. BOX 1900
RESERVOIR & MUMAUGH RDS.

LIMA, OHIO 45802

January 23, 1984

United States
Nuclear Regulatory Commission
Region III
799 Roosevelt Rd.
Glen Ellyn, Ill. 60137

RE: APPLICATION FOR AMMENDMENT
LICENSE NO. 34-16013-01
CONTROL NO. 75446

Dear Sirs:

Please find enclosed, the additional information you requested to continue your review of our amendment request dated August 19, 1983.

Mr. Heyneman and Mr. Smith's experience was gained at the Ohmart Training School in June, 1983. This course had a 4 hour session with practice in source installation, relocation, and shipping preparation. It included both class and lab work in proper forms and surveys to do the above tasks.

Receiving Shipments of Radioactive Material or Equipment

Purpose of this information:

To protect the health and safety of Lima's Procter & Gamble personnel while complying with our specific license.

Procedure

Upon the delivery, but before signing for any radioactive shipment, the following must take place:

1. Receiving person notifies R.P.O. of shipment arrival.

2. Inspects package for any visible damage.

3. R.P.O. surveys package with survey meter to assure the radiation level at the surface of the package does not exceed that shown below:

Number I	White	0.5 mr/hr
Number II	Yellow	50 mr/hr
Number III	Yellow	200 mr/hr

4. Should the results of steps two and three be acceptable, the R.P.O. will instruct the receiving person to sign for the shipment. Should step three be unacceptable, the driver or other person in charge of the carrier vehicle will be informed of the problem. The vehicle will be held and the U.S.N.R.C., the shipper, and the Plant Industrial Hygiene and Safety Manager will be contacted.

   The source will be covered, the area will be barracaded and posted using the appropriate signs.

5. Accepted package will be opened by the R.P.O., and its radioactive contents stored in the radiation cabinet.

6. The R.P.O. must enter the received materials in the Radiation Materials Log.

7. The R.P.O. must ascertain whether the received material is due for a wipe test and if so, perform said test.

No work will be performed on any source until the R.P.O., Pat Heyneman, or his assistant, Rick Smith, has closed, locked, or "tagged off" the shutter of the source until the work is completed. Pat Heyneman and/or Rick Smith will be responsible for enforcing these actions.

Access to the source area will be controlled by means of barriers and warning signs while work is in progress.

Responsibility for the Program

1. The Facility Radiation Protection Officer (RPO)

   a. Responsibilities of the RPO

      The RPO is responsible for developing and coordinating the overall Radiation Protection Program at the facility. While others may assist (formally or informally) in carrying out the program, the responsibility will not be delegated. Specific responsibilities of the RPO include:

      (1) Receive training and maintain a knowledge and understanding of the following:

         a. Principles and practices of radiation protection.
         b. Radioactivity measurement standardization and monitoring techniques and instruments.
         c. Mathematics and calculations basic to the use and measurement of radioactivity.
         d. Biological effect of radiation.

      (2) Understand and assure compliance with regulations of the Nuclear Regulatory Commission (NRC) or Agreement State concerning the use of radioactive materials.

(3) Understand and assure compliance with the facility Radioactive Materials License. This includes amending and renewing the license as needed.

(4) Ensure that all facility personnel who need to know are aware of his/her responsibilities and duties. For example, the following will be informed:

a. Operating Department utilizing the source.

b. Mechanical Department maintaining equipment in the vicinity of the source.

c. Protection and Fire Personnel.

d. Site Physician.

e. Industrial Hygiene and Safety Manager.

f. Process Safety Engineer.

NOTE: Others may be added as appropriate.

The RPO will inform the plant manager if, at any time, he/she is unable to perform the function satisfactorily.

(5) Maintain an inventory of sources used in the facility.

(6) Maintain the required records.

(7) Assist the line organization in developing Safe Work Practices (SWP's) for work around radioactive sources.

(8) Develop emergency procedures to respond to device malfunction or accidental damage.

(9) Train employees who need to know about the potential hazards of ionizing radiation, control measures, safe work practices, and emergency procedures.

(10) Develop the capability to conduct area radiation surveys as needed.

(11) Develop the capability to conduct personnel monitoring as needed.

(b) Qualifications of the RPO.

The RPO should be qualified commensurate with the variety, number and strength (activity) of sources used in the facility. A minimum amount of training is required for all RPO's. The following training guidelines apply:

(1) For facilities using at least one Specifically Licensed source, successful completion of the vendor's radiation protection training school (e.g., Ohmart Radiation Safety School). The NRC "recognizes" several of these vendor schools as acceptable training for specific license applicants.

(2) For a facility where several different types of sources or sources with several different types of radiation are used, a minimum three-day course in Radiation Protection is recommended.

The shutter of each source will be checked at the time of installation or relocation and every 6 months thereafter, for proper operation by means of sight and by use of a survey meter. The reading will become part of the permanent file of each source.

Field Radiation surveys will be taken upon completion of installation of all sources. A sketch (such as enclosed) of the source will be used to record the readings. Readings will be taken at several points on the surface of the source and recorded. Readings will then be taken at several points 12 inches in distance from the source and recorded on the sketch.

Procter & Gamble's safety guidelines do not permit readings in excess of 2mr/hr. Sources exceeding this limit will be shielded to bring readings below this limit.

All readings and surveys will be kept in the sources permanent file by the R.P.O. until the source is disposed of.

The cabinet will be a steel locker type that is lockable. When a source is stored in the cabinet, a field survey will be taken using an approved survey meter. The source will be shielded to the point that the surface of the cabinet will have a reading of 2 mr/hr. or less. If the readings exceed this, the cabinet will be posted in accordance with 10 CFR 20.203B.

The keys to this cabinet will be kept by the R.P.O. who will make frequent inventory of the cabinet. This cabinet will be kept in an area between our parts storage area and warehouse.

The R. L. Lander Jr. & Co. of Glenwood, Illinois will provide and read our film badges. The statement that Ohmart would read them was a mistake.

Mrs. L. A. Mugler

F-735 11/78 SP

THE PROCTER & GAMBLE CO.

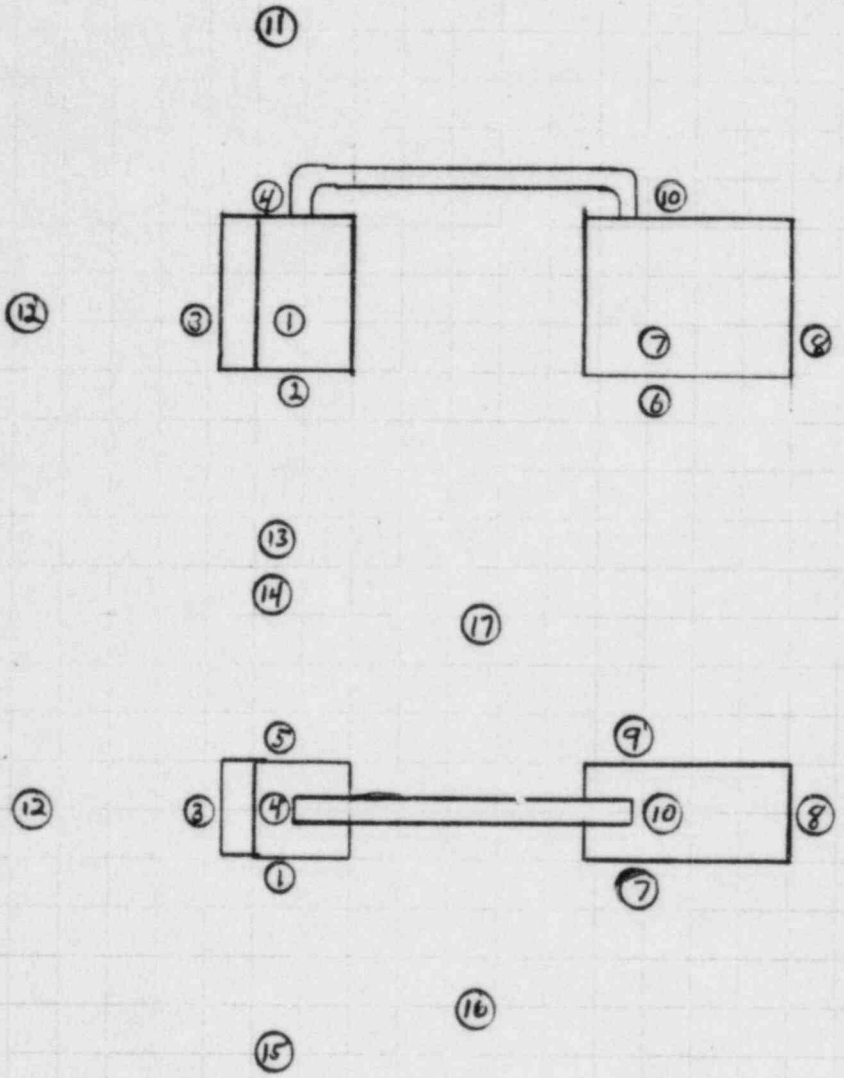
ENGINEERING DIVISION

CALCULATION AND SKETCH SHEET

Project Peco Pro Max 1000 Radiation feild Survey

Computer _____

Date _____



Survey Meter Contact

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Survey Meter 12" Distance

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17 _____

F-735 11/78 SP

THE PROCTER & GAMBLE CO.

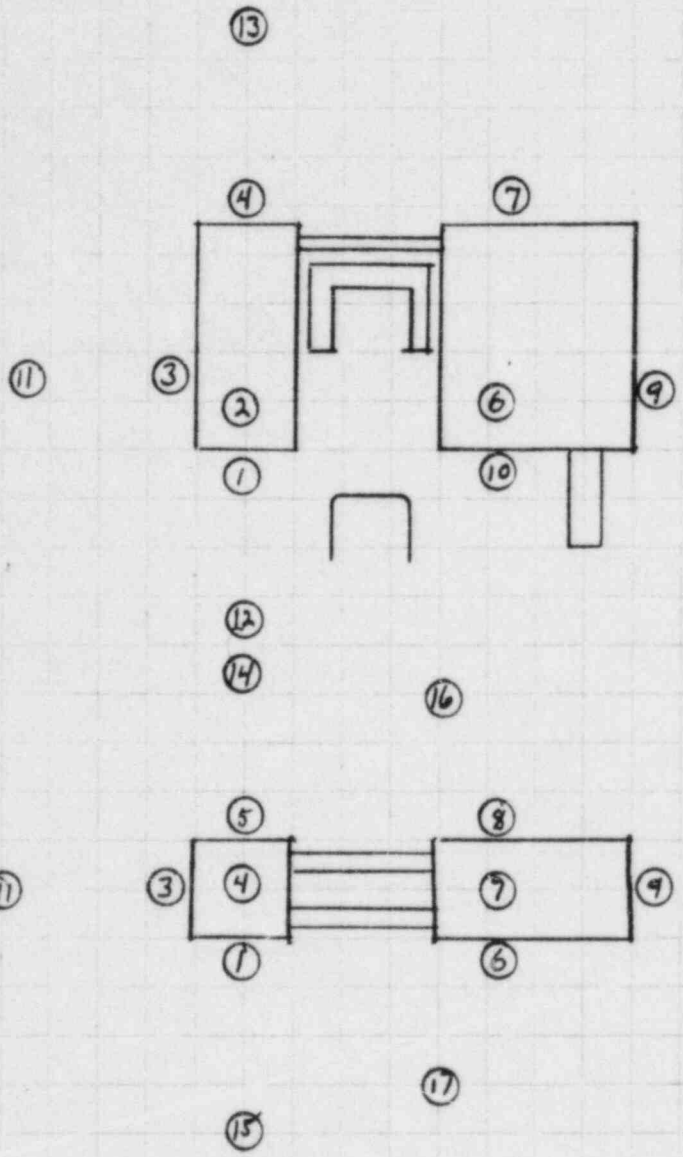
ENGINEERING DIVISION

CALCULATION AND SKETCH SHEET

Project Peco Gama 101 Radiation feild Survey

Computer

Date



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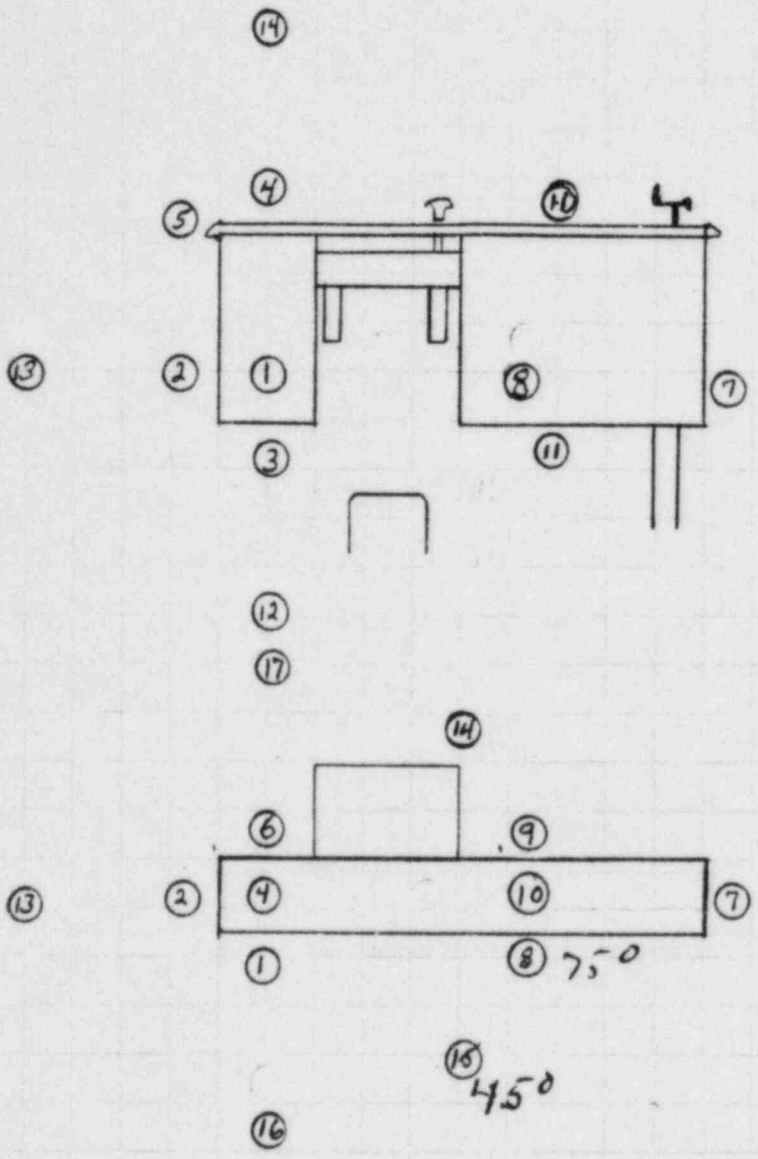
ENGINEERING DIVISION

CALCULATION AND SHEET

Project Filtec Ft 12 Computer

Radiation Feild Survey Date



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