

CHIRON | DIAGNOSTICS

PUBLIC / PDR  
Chiron Diagnostics Corporation  
132 Artino Street  
Oberlin, Ohio 44074-1293  
216.774.1041 Fax 216.774.3939

November 3, 1996

Materials Licensing Section  
Attn: Mr. Loren Heuter  
U.S. Nuclear Regulatory Commission  
Region III  
801 Warrenville Road  
Lisle, IL 60532-4351

34-26752-01  
030-34229

Re: NRC License Application, Control No. 301772

Dear Mr. Heuter:

This correspondence is in response to your review of our license application as documented via the conversation record dated October 28, 1996.

- \* Comment 1: Confirm that general laboratory safety instructions regarding the use of lab coats, gloves, and monitoring hands before leaving, will be posted in the area of use.

Response: The laboratory standard operating procedures will indeed reflect that personnel working with any radioactive material will wear lab coats and gloves and will monitor their hands prior to leaving the radioactive work area. These requirements will be also be posted in the work area.

- \* Comment 2: Regarding package receipt and opening, provide the following:

- Specify the location where incoming shipments will be delivered (should be single location).
- Address provisions for receipt of packages after normal working hours.
- If packages will be opened by persons other than the RSO or alternate RSO, please specify the training and procedures that will be provided to these individuals. It should include applicable requirements in 10 CFR 20.1906.

Response:

- Incoming shipments materials will be delivered to the shipping dock area of the facility where only the RSO or alternate RSO will take receipt.
- Packages of radioactive materials will not be received after normal work hours. This will be set-up with the supplier.
- In view of your comment, only the RSO or alternate RSO will open incoming packages.

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\* Comment 3: Regarding radwaste:

- a. Specify the location where decay in storage waste will be stored. Also confirm, that all radiation labels will be removed or obliterated before disposal.
- b. Confirm that any liquid wastes to the sanitary sewer system will meet the criteria in 20 CFR 20.2003.

Response:

- a. Decay in storage will occur in the secured Hazardous Waste Room (see attached figure).
- b. If liquid wastes are discharged to the local sanitary system, the criteria in 20 CFR 20.2003 along with applicable state and local regulations will be followed.

\* Comment #4: Regarding your request to name an alternate RSO on the license, our past experience has demonstrated the need to have a single individual with overall responsibility for a radiation safety program. It is acceptable, however, to request that we name an alternate RSO on a license provided certain conditions are satisfied. The alternate RSO must report to and be responsible to the RSO for all assigned RSO duties. You need to clearly state the duties, responsibilities, and limitations placed on the alternate RSO and in what situations he will act for the RSO (i.e. will assume all duties of the RSO, only in the absence of the RSO, for short periods of time not exceeding 30 days, etc.

Response: The RSO is responsible for the overall radiation safety program. The alternate RSO will report to the RSO in all activities related to function of the RSO. The alternate will act on behalf of the RSO when asked to do so by the RSO. The alternate RSO will assume all responsibilities of the RSO, only in the physical absence of the RSO. The alternate RSO will only fulfill the role of the RSO for a short period of time.

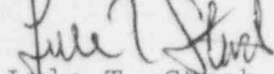
\* Comment 5: Confirm that you will perform and maintain on file a survey/evaluation showing individual(s) are not likely to exceed 10% of the annual dose limit if you choose not to provide personnel monitoring badges.

Response: In the event that individual dosimetry badges are not used, a survey/evaluation will be conducted to demonstrate that personnel are not likely to exceed 10% of the annual dose limit. The survey/evaluation will be kept on file.

Questions concerning this correspondence or the license application request should be directed to Susan J. Engelhardt (Engelhardt & Associates) at 1-(800)-525-3078 or Terry L. Ketchum at (216) 776-6462.

Your cooperation in the matter is greatly appreciated.

Sincerely,



Lyle T. Staab  
Executive Director,  
Manufacturing Operations

CC: Susan Engelhardt, Engelhardt & Associates

E. Lorain Street

South  
Parking  
Lot

North  
Parking  
Lot

132 Artino Street

NORTH

