

BOX 10172 LAMBERT FIELD \* ST. LOUIS, MISSOURI 63145 \* 314 AX 1-0540

August 13, 1971

Mr. Lawrence D. Low  
Director  
Division of Compliance  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

Dear Mr. Low:

Thank you very much for your letter of July 28, 1971 referring to an inspection of our facility by Mr. E. C. Ashley, during May 1971. After Mr. Ashley's inspection both Mr. Don Soldan, our Chief Radiological Protection Officer and I had a critique with Mr. Ashley and discussed the points as raised in your letter.

In answer to the points mentioned in your letter, I have the following comments:

1. "Contrary to 10 CFR 20.105(b)(2), "Permissible levels of radiation in unrestricted areas," radiation levels which existed from January 4-18, 1971, and from February 8-15, 1971, on the roof of a building located in an unrestricted area across a driveway north of the company's facilities were such that an individual, if continuously present, could receive a dose in excess of 100 mrem in any seven consecutive days."

This was thoroughly discussed with Mr. Ashley and unanimously agreed that the problem had been solved due to the relocation of our waste storage area, that was made possible through our expanded building program.

2. Contrary to 10 CFR 20.201(b), "Surveys"

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- 2.a. "No surveys for airborne radioactive material were performed on the exhaust stack effluents from the Building 300 dispensing laboratory during the period January 11, 1971 to May 11, 1971, to determine compliance with 10 CFR 20.106(a) "

Surveys of the airborne radioactive material present in the exhaust stack effluents were begun on May 11, 1971, after completion of the installation of the environmental air sampling system and stations for Building 300. The delays in making this system operational did not originate within the Radiological Protection Department, but rather within the Maintenance Department. The managerial responsibility for all maintenance work has since been transferred to another individual who clearly understands that radiological protection jobs must receive high priorities. Effluent air concentrations, as measured before leaving the restricted roof area, have averaged much less than the maximum permissible concentration for unrestricted areas.

- 2.b. "No surveys were performed for airborne radioactive material to which individuals were exposed in the Building 300 dispensing laboratory during the period January 11, 1971, to May 10, 1971, to determine compliance with 10 CFR 20.103(a) "

Our records show that surveys were performed in the dispensing laboratory during the period in question. Initial spot sampling was done with portable air sampling equipment starting the first day of operation on January 11, 1971. On January 20, 1971 to date, continuous samples have been obtained from dispensing department stations D1, D2 and D3 using an above the ceiling manifold system and pump installed for this purpose. An additional sampling station was installed in the lunchroom (G9) and another in the shipping department (S1) in Building 300 on May 10, 1971. Installation of these stations must have misled your inspector into believing that the dispensing department stations were installed the same day.

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2.c. "An inadequate evaluation was made of the high TLD results obtained of radiation levels in the location described in Item 1 above for the period January 4-11, 1971. As a result, radiation levels continued to exceed the requirements of 10 CFR 20.105(b)(2) during the period January 11-18, 1971. "

An agreement had been made before commencing our, then new, dosimetry service for them to provide us prompt reports on any exposures above specified levels. The prompt results for the week of January 4th to the 11th, 1971 were received by us on the 14th. However, the TLD results were not included in this report and were not received until the 21st as part of the complete written record. For this reason, we were not able to act upon the results of the first week to reduce the radiation level in the unrestricted area during the following week of January 11th to the 18th, 1971.

This omission was pointed out to our dosimetry service which has since provided us prompt results for our area TLD's. Relocation of our radioactive waste storage area as previously mentioned, reduced radiation levels to about 50 mrem per week. The project involving relocation and shielding of our absolute filtration systems has also been completed with an associated additional reduction in radiation levels to about 25 mrem per week at the unrestricted area location according to our TLD records.

With regard to the individual's extremity exposure, we will inform her that her radiation history records will be revised to show her exposure may have been as high as 17.25 rem for the period in question.

As you are undoubtedly aware, I was appointed Director of Operations in March of this year; and while I have not as yet had the privilege of meeting you, I want to assure you that you will continue to receive our full cooperation in any and all inspections that your agency cares to make at our facility. We have dedicated ourselves to the proposition

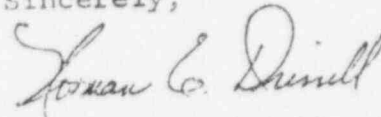
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that we will operate well within the guidelines of all federal agencies; and anytime it is brought to our attention that we are falling outside the bounds of these regulations, we will take immediate steps to correct the situation.

If you find occasion to be in St. Louis or the immediate area anytime in the near future, please come by our Maryland Heights plant so that we may become better acquainted. If there are additional questions that you have concerning our operations, please do not hesitate to contact me.

I might also add that I was much impressed with the professional way Mr. Jim Ashley conducted his inspection; and with men such as this on your staff, I am sure that you will achieve the goals you have set forth.

Sincerely,



Norman E. Drissell  
Director of Operations

NED:cm

cc: E. C. Ashley  
USAEC - Region III  
799 Roosevelt  
Glen Elyn, Illinois