



ROLLINS

ENVIRONMENTAL, INC.

3985 RESEARCH PARK DRIVE
ANN ARBOR, MICHIGAN 48108
313/761-1389

January 23, 1997

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

RE: Reply to a Notice of Violation, Docket No. 030-20817

During the NRC inspection conducted on 10/21/96 and 11/18/96, it was determined that Environmental Control Technology Corporation was or had previously been in violation of three items in license no. 21-15470-02. Each of the three violations is addressed below.

1. Contrary to condition 16 of the license, the licensee had not conducted a foil source inventory every six months. No inventory had been performed from the issuance of the license through 1/17/94 or thereafter.

While not an excusable reason, Environmental Control Technology Corporation was unaware of this condition in the license. As a corrective action, a physical inventory is currently being performed and a schedule has been established for ongoing inventory checks. To facilitate the schedule, a spreadsheet was created to record the inventories; please see the enclosed inventory spreadsheet which includes the partially completed inventory event. The inventory process has been completed for the facility located at 3985 Research Park Drive and will be completed for the facility located at 3965 Research Park Drive by 1/31/97. The status of the ECD sources prior to the 1/17/94 inventory was addressed in a letter to Mr. John Jones of Region III NRC on November 14, 1996. A copy of this letter is also enclosed.

The license inventory frequency requirement will be met by January 31, 1997.

2. Contrary to condition 17.A. of the license, the licensee had not performed leak tests on five of the ECD sources within the specified 36 month time frame.

Again, while not an excusable reason, Environmental Control Technology Corporation was unaware of this condition in the license prior to approximately 1991. At the time of the inventory performed on 1/17/94, all ECD sources which were not

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in compliance were scheduled for leak checks. By 2/17/94, all ECD sources were in compliance with the leak check frequency.

A corrective action has been implemented to facilitate the scheduling of leak checks for all ECD sources. A spreadsheet was created containing all ECD sources and their leak check dates to simplify the review and scheduling of future leak checks. Upon completion of this spreadsheet it was noted that one ECD source, A3901, had been missed for its scheduled leak check in February of 1996. It is believed that this source was overlooked due to the odd timing for this particular ECD source. All other ECD sources were scheduled for leak checks in February or August of years other than that for source A3901. The wipe test has been performed by our staff for this ECD source and has been sent to C.J. Bruyn & Co. for analysis. This ECD source will now fall in the same scheduling sequence as the remaining ECD sources so that all ECD sources will be grouped together to be leak checked in no more than three events for every 36 month interval.

At this time, all ECD sources are in compliance with the 36 month wipe test frequency.

3. Contrary to 10 CFR 30.34(b) and Parts 31 through 36, and 39, the licensee transferred license no. 21-15470-02 to Rollins Environmental Services, Inc. on 08/05/86 without obtaining the consent of the Commission in writing.

At the time of the ownership transfer to Rollins Environmental Services, Inc., Environmental Control Technology Corporation was unaware of the requirement to notify the Commission in writing of such a transfer, particularly since the Rollins Environmental Services, Inc. name was not assumed by Environmental Control Technology Corporation.

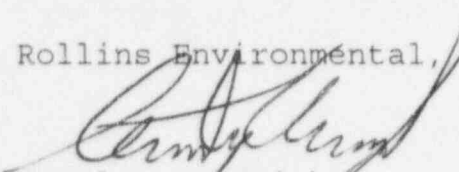
Since the US NRC is currently aware of the ownership change that took place in 1986, no further corrective action is planned at this time unless otherwise notified. All future name changes and ownership transfers will be supplied to the US NRC in writing.

While the parent company name currently remains the same, Rollins Environmental Services, Inc., Environmental Control Technology Corporation has changed its name to Rollins Environmental, Inc.\ENCOTEC.

If there are any questions, please feel free to contact me.

Sincerely,

Rollins Environmental, Inc.\ENCOTEC



Stanley R. Smith
Radiation Safety Officer

cc: US NRC Region 3 Administrator
John Schenk (Vice-President, REI\ENCOTEC)
Walt Roudebush (Technical Director, REI\ENCOTEC)
Jim Kuehn (Director of Chemistry, REI\ENCOTEC)

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