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FEDERAL EXPRESS

October 7, 1985 ✓

Ms. Toye L. Simmons
Radiation Specialist
Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Ms. Simmons:

I want to thank you again for your help with regard to the nuclear materials matter at our plant in Plymouth, Indiana. I also want to reiterate Del Monte's concern about this incident, and to reinforce the corrective measures that will be taken.

While you were at our plant, I'm sure you were conscious of Ken Peacock's prompt attention to our obligations. Such responses are typical for our plant managers. After your inspection he telephoned both his line management and my corporate staff office to discuss the matter in detail. As I mentioned to you on the telephone, these kinds of matters are always brought to the immediate attention of our top production management.

Once assured that there were no immediate problems at hand; that this particular incident was under control, all of us immediately focused on the future -- how to prevent a recurrence. I assure you there is full management support in this regard. As a first step, we will issue a reminder notice to our plant managers this week pointing out our basic obligations relative to using and testing equipment containing nuclear material.

We concur with your suggestion to develop a centralized control system for all nuclear materials. However, we envision using this centralized approach more as a back up. That is, in addition to this central approach, we are going to develop a means to reassure ongoing proper management/control of the nuclear materials at each location where they are used. This will be the primary control point, with the central repository being used for reassurance purposes. In total, these control measures will assure us of knowing where the various materials are located, what the materials are, and that proper and timely testing is performed.

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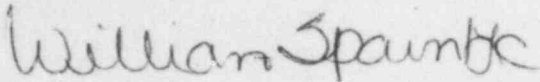
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As I think you will agree, the circumstances behind the incident at Plymouth were highly unusual and unique. Certainly, had there been any knowledge that the material was present in the equipment being discarded it would have been handled properly. As a matter of routine, those plant managers having any nuclear material on site know their resultant obligations. With the additional safeguards discussed above, we will also be able to reassure both full awareness and knowledge of the substances we have on hand and the necessary testing and handling procedures for them.

Very truly yours,

Del Monte Corporation

A handwritten signature in cursive script that reads "William Spain".

William J. Spain
Director,
Corporate Quality Assurance
& Regulatory Affairs

WJS:lrc

cc: K. L. Peacock - Plymouth