

DcD

February 19, 1997

Stanley R. Smith  
Radiation Safety Officer  
Environmental Control Technology  
3985 Research Park Drive  
Ann Arbor, MI 48108

SUBJECT: NOTICE OF VIOLATION DATED DECEMBER 24, 1996

Dear Mr. Smith:

This acknowledges receipt of your letter dated January 23, 1997, in response to our letter dated December 24, 1996, transmitting a Notice of Violation.

We have reviewed your corrective actions, which appear to be adequate, and have no further questions at this time. These corrective actions will be examined during a future inspection.

Sincerely,

Original Signed by Roy J. Caniano

Cynthia D. Pederson, Director  
Division of Nuclear Materials Safety

License No. 21-15470-02  
Docket No. 030-20817

bcc w/ltr dtd 01/23/97 PUBLIC

DOCUMENT NAME: G:\LTRS2LIC\MTLS\030\97320817.L01

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	DNMS/RIII	<input checked="" type="checkbox"/>	DNMS/RIII	<input checked="" type="checkbox"/>	DNMS/RIII	<input checked="" type="checkbox"/>			
NAME	JJones:brt		MPHips		CPederson				
DATE	02/18/97		02/18/97		02/19/97				

OFFICIAL RECORD COPY

9702250033 970219  
PDR ADOCK 03020817  
C PDR

11  
IE07



# 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

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.

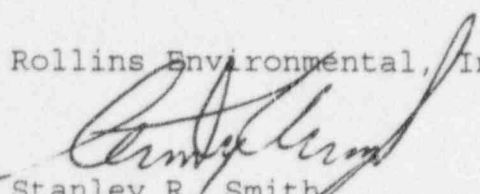
Since the US NRC is currently aware of the ownership change that took place in 1986, no further corrective action is planned at this time unless otherwise notified. All future name changes and ownership transfers will be supplied to the US NRC in writing.

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)

enclosures

#12000

# ROLLINS

ENVIRONMENTAL SERVICES (DE) INC.

One Rollins Plaza, P.O. Box 2349, Wilmington, DE 19899, 302/426-2700

November 14, 1996

Mr. John D. Jones  
Senior Radiation Specialist  
United States Nuclear Regulatory Commission  
Region III  
801 Warrenville Road  
Lisle, IL 60532-4351

Dear Mr. Jones:

This letter is in response to your inquiry with Messrs. Stan Smith and Walt Roudebush of our ENCOTEC division regarding the inventory management of sealed radioactive sources during the period 1983 through 1988. I have been contacted due to the fact that I was listed on Environmental Control Technology Corporation's (hereafter referred to as ENCOTEC) materials license as an individual with supervisory authority in the execution of the license's requirements. During the 1983-1988 time period, I was the responsible manager for all chemistry operations.

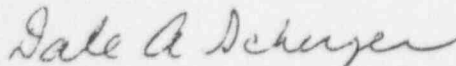
You have asked questions regarding the physical inventory of sealed sources during that time period.

To my knowledge, the inventory practices associated with management of those sealed sources during that time period did not result in the loss of any source material. During the early years 1983-1986, ENCOTEC possessed at most 3 gas chromatographs employing electron capture detectors. Although inventory records are not available from that period, the staff who supervised the laboratory were capable, responsible individuals. The company experienced modest to significant growth during the next three years and all gas chromatographs and their detectors could be accounted for and would be present on any subsequent inventory such as that performed in 1994.

The laboratory staff and I knew we worked with sealed sources in the GC units, and completely understood the need to control these devices. Therefore, I firmly believe that there was no loss of any source material during this time period.

Sincerely,

ROLLINS ENVIRONMENTAL, INC.



Dale A. Scherger, P.E.  
Vice President of Engineering  
& Technology

✓cc: Stan Smith (RSO), ENCOTEC

Serial No.	Location	I - IF IN HOUSE R - IF REMOVED										
		01/97	07/97	01/98	07/98	01/99	07/99	01/00	07/00	01/01	07/01	01/02
A3901	ENCOTEC-2											
A4923	ENCOTEC-2											
A9183	Org. Extraction	I										
A5282	ENCOTEC-2											
A9178	ENCOTEC-2											
A9181	ENCOTEC-2											
A9179	GC/HPLC	I										
A9182	GC/HPLC	I										
A848	GC/HPLC	I										
A5228	GC/HPLC	I										
A5361	GC/HPLC	I										
A6183	GC/HPLC	I										
A7186	GC/HPLC	I										
A7682	GC/HPLC	I										
C8192	GC/HPLC	I										
A8568	GC/HPLC	I										
A8822	GC/HPLC	I										
A9176	GC/HPLC	I										
C9191	GC/HPLC	I										
A9482	GC/HPLC	I										
A9483	GC/HPLC	I										
A4002	GC/HPLC	I										
DATE INITIALS		1/8/97 (M)										



Serial No.	Location	LEAK CHECK DATE						
A3901	CLP-E2	2/25/93						
A4923	CLP-E2	11/5/92	8/7/95					
A9183	Org. Extraction	4/8/92	8/7/95					
A5282	CLP-E2	12/13/86	2/17/94					
A9178	CLP-E2	4/7/92	8/7/95					
A9181	CLP-E2	4/8/92	8/7/95					
A9179	GC/HPLC	2/17/94						
A9182	GC/HPLC	4/8/92	2/17/94					
A848	GC/HPLC	9/10/91	8/25/94					
A5228	GC/HPLC	2/17/94						
A5361	GC/HPLC	11/19/86	2/17/94					
A6183	GC/HPLC	11/30/89	2/17/94					
A7186	GC/HPLC	5/29/91	8/25/94					
A7682	GC/HPLC	7/30/91	8/25/94					
C8192	GC/HPLC	2/17/94						
A8568	GC/HPLC	9/10/91	8/25/94					
A8822	GC/HPLC	2/17/94						
A9176	GC/HPLC	4/6/92	8/7/95					
C9191	GC/HPLC	9/16/91	8/25/94					
A9482	GC/HPLC	10/20/92	8/7/95					
A9483	GC/HPLC	10/20/92	8/7/95					
A4002	GC/HPLC	8/7/95						

Jones

# ROLLINS

ENVIRONMENTAL SERVICES (DE) INC.

One Rollins Plaza, P.O. Box 2349, Wilmington, DE 19899, 302/426-2700

November 14, 1996

Mr. John D. Jones  
Senior Radiation Specialist  
United States Nuclear Regulatory Commission  
Region III  
801 Warrenville Road  
Lisle, IL 60532-4351

Dear Mr. Jones:

This letter is in response to your inquiry with Messrs. Stan Smith and Walt Roudebush of our ENCOTEC division regarding the inventory management of sealed radioactive sources during the period 1983 through 1988. I have been contacted due to the fact that I was listed on Environmental Control Technology Corporation's (hereafter referred to as ENCOTEC) materials license as an individual with supervisory authority in the execution of the license's requirements. During the 1983-1988 time period, I was the responsible manager for all chemistry operations.

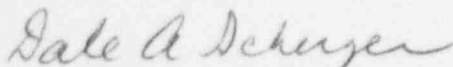
You have asked questions regarding the physical inventory of sealed sources during that time period.

To my knowledge, the inventory practices associated with management of those sealed sources during that time period did not result in the loss of any source material. During the early years 1983-1986, ENCOTEC possessed at most 3 gas chromatographs employing electron capture detectors. Although inventory records are not available from that period, the staff who supervised the laboratory were capable, responsible individuals. The company experienced modest to significant growth during the next three years and all gas chromatographs and their detectors could be accounted for and would be present on any subsequent inventory such as that performed in 1994.

The laboratory staff and I knew we worked with sealed sources in the GC units, and completely understood the need to control these devices. Therefore, I firmly believe that there was no loss of any source material during this time period.

Sincerely,

ROLLINS ENVIRONMENTAL, INC.



Dale A. Scherger, P.E.  
Vice President of Engineering  
& Technology

cc: Stan Smith (RSO), ENCOTEC

NOV 18 1996