

RJM

October 29, 1985

United States Nuclear Regulatory Commission
Region 1
63 Park Ave.
King of Prussia, PA 19406

Attn: John D. Kinneman

Subject: Inspection #99990001/85-13
General License

Dear Mr. Kinneman:

In response to the violation of NRC enforcement Policy Section 10 CFR 31.5 (2) (2), RJM immediately upon notification by Marlene J. Taylor began steps to come into compliance.

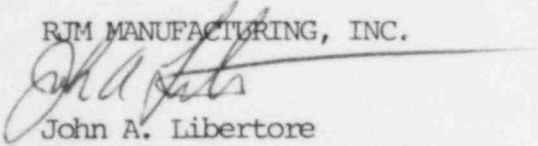
Please note the following steps:

- 1) The enclosed memo was distributed to all shift supervision and manufacturing support staff.
- 2) A separate memo was issued to all process personnel. (enclosed)
- 3) Files were updated on all NDC gauges, and a reminder systems was established to ensure the leak test would be performed as scheduled, regardless of notification of the manufacturer.
- 4) All NDC gauges were tested July 3, 1985 and are scheduled to be tested in late December.

As of this date, I consider RJM to be in full compliance with this policy.

Sincerely yours,

RJM MANUFACTURING, INC.


John A. Libertore
Plant Manager

cc: C. Wilson
JAL:rr
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INTER-OFFICE MEMO

RJM MANUFACTURING, INC.

TO: All Process Personnel

DATE: June 17, 1985

FROM: John Liberatore

RE: NDC Gauge - Standard Operating Procedure

NDC gauges mounted on extruders and # 2 & # 3 coaters contain radioactive probes used to measure film thickness. Under normal operating conditions, these devices pose no hazard.

To insure safe operation of gauge, please take note of the following:

1. IN CASE OF SUSPECTED DAMAGE TO THE RADIOACTIVE SOURCE, CONTACT SHIFT SUPERVISOR IMMEDIATELY.
2. DO NOT IN ANY WAY OPEN OR ALTER ANY PART OF THE PROBE.
3. DO NOT IN ANY MANNER ATTEMPT TO EXAMINE THE SOURCE, TO CHANGE IT IN ANY WAY, OR TO TOUCH IT WITH SHARP OR POINTED INSTRUMENTS.
4. DO NOT UNNECESSARILY LOOK AT THE OPEN PROBE FACE OR ALLOW THE PROBE FACE TO BE DIRECTED TOWARD THE BODY.
5. AVOID POINTING OR POSITIONING THE PROBE IN SUCH A WAY THAT PERSONNEL ARE CLOSER THAN TWO (2) FEET IN A DIRECT LINE WITH THE PROBE FACE.
6. WHEN NOT IN USE, KEEP THE PROBE SHUTTER CLOSED.
7. DO NOT CONNECT OR DISCONNECT THE PROBE WITH THE POWER ON.
8. FOLLOW NORMAL OPERATING PRECAUTIONS AS WOULD BE REQUIRED FOR ANY ELECTRICAL DEVICE TO PREVENT SHOCK HAZARD.

INTER-OFFICE MEMO

RJM MANUFACTURING, INC.

TO: Shift Supervision

DATE: June 17, 1985

FROM: XXXXXXXXXX

RE: NDC Gauge - Standard Operating Procedure

The following procedures must be maintained to insure safe operation of NDC gauges:

1. Craig Wilson is responsible for the operation of these gauges. In the event of a problem, contact Craig. If Craig is not available, contact John Liberatore or Eric Neumann.
2. WHEN NOT IN USE, KEEP THE PROBE SHUTTER CLOSED.
3. AVOID POINTING OR POSITIONING THE PROBE IN SUCH A WAY THAT PERSONNEL ARE CLOSER THAN TWO FEET IN A DIRECT LINE WITH THE PROBE FACE.
4. DO NOT UNNECESSARILY LOOK AT THE OPEN PROBE FACE OR ALLOW THE PROBE FACE TO BE DIRECTED TOWARD THE BODY.
5. DO NOT IN ANY MANNER ATTEMPT TO EXAMINE THE SOURCE, TO CHANGE IT IN ANY WAY, OR TO TOUCH IT WITH SHARP OR POINTED INSTRUMENTS.
6. DO NOT IN ANY WAY OPEN OR ALTER ANY PART OF THE PROBE.
7. DO NOT ALLOW NON-INFORMED PERSONNEL TO HANDLE THE UNIT.
8. IF ANY QUESTIONS SHOULD ARISE, CONTACT THE RADIATION SAFETY OFFICER AT NDC SYSTEMS.
9. AT ALL TIMES, OPERATE THE GAUGE SO THAT NO PERSONNEL ARE CLOSER THAN TWO FEET TO THE FRONT OF THE PROBE WHEN THE SHUTTER IS OPEN.

IN MOST CASES, THIS WILL OCCUR NATURALLY, DUE TO THE MEASUREMENT LOCATION AND THE INACCESSIBILITY OF PERSONNEL TO THE PROBE. HOWEVER, THE SAFETY OFFICER SHOULD PRE-CHECK ALL MEASUREMENT POINT AREAS AND SPECIFY A MEASUREMENT PROCEDURE THAT WILL ENSURE NO PERSONNEL WILL BE ABLE TO APPROACH CLOSER THAN TWO FEET TO THE FRONT OF THE PROBE.

10. IN CASE OF SUSPECTED DAMAGE TO THE RADIOACTIVE SOURCE CONTACT CRAIG WILSON OR ALTERNATES, THEN FOLLOW OUTLINED PROCEDURES BELOW:

Procedure in case of Suspected Damage to the Source

This procedure is designed to prevent the possible spread of radioactive material. It should be carried out preferably by one person. Conduct this procedure in as limited a physical area as possible. Because of its physical location, and its construction, (stainless steel helium arc welded), it is highly unlikely that any damage will occur to the source. However, in case of actual or suspected damage, the following procedure should be followed:

1. Place the entire probe in a plastic bag and seal, or in any container with a tight lid.
2. Notify the nearest State Department of Public Health or the nearest NRC office.* This information will have been supplied by NDC Systems when you purchased the gauge.
3. Isolate the sealed unit in an unused and secure area.
4. All personnel involved should wash their hands thoroughly.
5. If possible, rope off the area involved until such time as the proper authorities have arrived to investigate
6. Call NDC Systems collect.

* NRC Office 215-337-5000 (FTS 488-1001,)

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631 Park Avenue
King of Prussia, PA 19406

11. Wipe Test Requirements

State and Federal regulations require that at six month intervals, the radioactive source be tested for seal integrity by performing a wipe test. The user is expected to file the results and they are to be available for inspection by the proper authorities.

June 17, 1985

NDC Systems supplies the first wipe test when the gauge is shipped. NDC offers an economical and reliable follow-on wipe test service.

JL/rj

cc: Ron Howard
Craig Wilson
Eric Neumann
Dick Beaulieu