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November 18, 1985

John D. Kinneman, Chief
Nuclear Materials Safety Section A
Division of Radiation Safety and Safeguards
United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

RE: Crowell Corporation Inspection No. 99990001/85-46

Dear Mr. Kinneman:

The Crowell Corporation has asked me to respond to your letter of October 25, 1985 concerning the special safety inspection conducted by Marlene J. Taylor on August 29, 1985. Of specific concern is the notice of violation attached as Appendix A to your letter which indicated that a gauge containing 1.2 curies of krypton-85 was removed from one location and installed in another location by persons not holding a specific license to perform such activities.

This gauge, which is used to measure the thickness of gummed paper, was moved by The Crowell Corporation from its old gumming machine to its new machine located in the same room. The Crowell Corporation unbolted the gauge from its old position and rebolted it onto its new position. They did not open the gauge, perform any work on the gauge, perform any test, servicing, or inspection or removal of radioactive materials or its shielding. The Crowell Corporation did not realize that even just moving the gauge required licensed persons.

It has been the routine practice of The Crowell Corporation to have the LFE Process Control Division, a company licensed by the Nuclear Regulatory Commission to do such work, do all the testing, maintenance, and repair work on this equipment. I am enclosing for your records copies of all of the maintenance and repair records of LFE in this regard. As you can see by the most recent inspection report of LFE dated October 3, 1985, the gauge was fully inspected by LFE since its reinstallation on the new machine.

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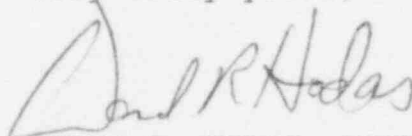
In your notice of violation you requested The Crowell Corporation to provide a written reply, including a statement as to: 1) corrective steps which have been taken and the results achieved; 2) corrective steps which have been taken to avoid further violation; and 3) the date when full compliance will be achieved.

As to the corrective steps for the installation itself, as you can see by the LFE Report of October 3, 1985, LFE has fully inspected the installation and has determined that it was properly installed and meets all Nuclear Regulatory Commission and related requirements. As to corrective steps which should be taken to avoid further violations, I am enclosing a copy of a memorandum from Robert W. Adelman, Vice President of the Crowell Corporation, to the Plant Engineer, Shop Foreman, and Production Manager advising them that all testing, installations, servicing, and removal of installation involving the radioactive materials, its shielding or containment are to be performed by a person holding a specific license and that LFE is to be contacted for all future needs in connection with this gauge. This memorandum is being appropriately posted in the plant so that the maintenance people will all be aware of the requirement that only licensed personnel perform work on the gauge, including moving it from one location to another. Thus, as of this date, we believe full-compliance has been achieved.

It should be noted that the only thing that The Crowell Corporation did was physically move the gauge from one location to another. They did not open the shutter, make any adjustments, or do any other work whatsoever with respect to the gauge. We believe that the Crowell Corporation is now in full-compliance.

We will assume, based upon this letter, that this matter has been satisfactorily corrected.

Very truly yours,



DAVID R. HODAS, ESQUIRE

DRH:bk

cc: Robert W. Adelman

Enclosure