



twin city testing
corporation

DMB COPY

662 CROMWELL AVENUE
ST. PAUL, MN 55114
PHONE 612/645-3601

February 3, 1986

US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attn: D J Sreniawski, Chief
Nuclear Materials Safety
Section 2

Gentlemen

Subj: Inspection of Licenses Numbers 22-01376-02, 22-01376-03 and
22-01376-04

This letter is in response to your letter dated January 8, 1986
which you listed the results of the safety inspection conducted by
Mr James L Lynch of your office.

The items of apparent non-compliance and our response is as follows:

A. License 22-01376-02 - Industrial Radiography

No items of non-compliance were identified with this license
program.

B. License 22-01376-03 - License for Sources in Gas Chromatograph for
Chemical Analysis

The Ni⁶³ sources in this equipment was not leak tested at six-month
intervals as specified in the License.

Failure to leak test these sources was in part due to a change in
the management of our chemistry division.

Mr William Welbes was appointed head of the chemistry division
when the former head Albert Holler retired.

Leak tests of these sources were made on December 6, 1985.

I sent the wipes in for analysis to ICN of Irvine, California and
had the results sent to me.

From now on, I will give the leak test kits to the chemist in
charge of the equipment and I will see that the wipes are sent in
for analysis within the six-month interval.

8602190364 860213
REQ3 LIC30
22-01376-02 PDR

AN EQUAL OPPORTUNITY EMPLOYER

FEB 6 1986

11
I 807

B. License 22-01376-03 (cont)

Further, I will maintain the results of these leak tests along with my records of radiography and soil-moisture/density gauge sources. Copies of the leak test results for these Ni⁶³ sources accompany this letter. I believe this action will prevent a further occurrence of this item of non-compliance.

C. License 22-01376-04 - License for Soil Moisture/Density Gauge Sources

On the day of the inspection by James Lynch, a soil moisture/density was sitting on the floor of our laboratory outside of the designated storage closet where it is normally kept.

No one was in attendance at the gauge location when the area was checked by your inspector.

This is contrary to 10 CFR 20.207.

Condition 10 of this license states that gauges with these radioactive sources be used only at authorized licensee facilities and at temporary jobsites.

Contrary to this requirement, these gauges are taken home on occasion by employees who operate these gauges because of their work schedules. This practice is not authorized by our license.

A memo was sent to the supervisors and technicians of the Soils and Geology Department who operate and are responsible for the safe handling of this equipment by the manager of the department stating that the gauges must be locked in the designated closet in the laboratory whenever the gauges are not being used. The door to this closet is locked and posted with a "Caution - Radioactive Materials" sign.

On occasion a technician takes a gauge to various jobsites when there is a heavy workload. This situation occurs predominately in summer. If the technician works quite late, he has taken the gauge home with him and stored it at home overnight.

While this is not done on a regular basis, it never-the-less constitutes an item of non-compliance with the conditions of our license.

C. License 22-01376-04 (cont)

The corrective action I would propose would be to request an amendment to License 22-01376-04 authorizing a private home as a temporary site for storage of licensed material provided it is locked and secured in a cabinet or closet and the door to such storage facility is posted with a "Caution - Radioactive Materials" sign. Further, access to this cabinet or closet must be limited to the operator of the gauge containing licensed material.

This amendment will be sent under separate cover.

The corrective action taken for the violation under License No. 22-01376-03 has been completed.

By my taking the responsibility of maintaining leak test records for these sources in addition to the radiography and soil moisture/density sources should prevent a re-occurrence of this deficiency.

The corrective action taken to correct the violation of failure to maintain control and direct surveillance of licensed material stored in our laboratory has been accomplished by the manager of the department. This action consisted of distributing the notice of violation to each supervisor and technician with instructions to keep the storage facility locked at all times.

The question of storage of licensed material at temporary locations under controlled conditions will be resolved if our proposed amendment to this license meets with NRC approval.

If you have any further questions regarding this response, please contact me.

Very truly yours



Howard T. Schulze
Radiation Safety Officer

HTS/jak

Attachments

X Check Attached Bill me on PO #

HS-9
1/74

LEAK TEST CERTIFICATE

SOURCE DATA

Source owned by TWIN CITY TESTING Corporation
Street Address 662 CROFTWELL AVE Phone # 62-645-3601
City ST PAUL State MA Zip Code 55117
Source manufactured by (Company Name) NEW ENGLAND NUCLEAR
Source Model No. 009-0282 Source Serial No. 3920 SOURCE -
Isotope NI-63 Activity (mCi) 15
Date of Test 12-6-85 Performed by W. WILKES
(Print Name)

Note: Send results to Howard T. Schulze R.S.O.

TEST DATA

Sample Activity 2.3×10^{-5} μCi or 50 dpm
Counting Log No. BKG

0.005 μCi or 11,000 dpm is classified as a Leaking Source

The source was:

Leaking ☐
Not Leaking ☒

JAN 23 1986

DATE

McRayport

Health Physicist



ICN Pharmaceuticals, Inc.
Health Physics Services

2727 Campus Drive
Irvine, California 92715
Tel: (714) 833-2500

X Check Attached _____ Bill me on PO # _____

HS-9
1/74

LEAK TEST CERTIFICATE

SOURCE DATA

Source owned by TWIN CITY TESTING Corporation
Street Address 662 CROMWELL AVE Phone # 612-645-31
City ST PAUL State MN Zip Code 55114
Source manufactured by (Company Name) NEW ENGLAND NUCLEAR
Source Model No. 330-0119 Source Serial No. Sigma 4B
Isotope Ni-63 Activity (mCi) 10 (dual block)
Date of Test 12-6-85 Performed by W. WELLES
(Print Name)

Note: Send results to Howard T. Schmitz, R.S.G.

TEST DATA

Sample Activity 2.3 X 10⁻⁵ BQ 50 dpm
Counting Log No. BKG

0.005 μ Cl or 11,000 dpm is classified as a Leaking Source

The source was:

Leaking ☐
Not Leaking ☒

JAN 23 1986

DATE

ME Royse
Health Physicist



ICN Pharmaceuticals, Inc.
Health Physics Services

2727 Campus Drive
Irvine, California 92715
Tel. (714) 833-2500

NOTE: Twin City Testing
& Engr. Lab, Inc.

February 3, 1986

US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Attn: D J Sreniawski, Chief
Nuclear Materials Safety
Section 2

Gentlemen

Subj: Inspection of Licenses Numbers 22-01376-02,
22-01376-03 and 22-01376-04

This letter is in response to your letter dated January 8, 1986 in which you listed the results of the safety inspection conducted by Mr James L Lynch of your office.

The items of apparent non-compliance and our response is as follows:

A. License 22-01376-02 - Industrial Radiography

No items of non-compliance were identified with this license program.

B. License 22-01376-03 - License for Sources in Gas Chromatograph for Chemical Analysis

The Nickel⁶³ sources in this equipment were not leak tested at six-month intervals as specified in the License.

Failure to leak test these sources was in part due to a change in the management of our chemistry division.

Mr William Welbes was appointed head of the chemistry division when the former head Albert Holler retired.

Leak tests of these sources were made on December 6, 1985.

I sent the wipes in for analysis to ICN of Irvine, California and had the results sent to me.

From now on, I will give the leak test kits to the chemist in charge of the equipment and I will see that the wipes are sent in for analysis within the six-month interval.

FEB 4 1986

B. License 22-01376-03 (cont)

Further, I will maintain the results of these leak tests along with my records of radiography and soil-moisture/density gauge sources. Copies of the leak test results for these Ni⁶³ sources accompany this letter. I believe this action will prevent a further occurrence of this item of non-compliance.

C. License 22-01376-04 - License for Soil Moisture/Density Gauge Sources

On the day of the inspection by James Lynch, a soil moisture/density was sitting on the floor of our laboratory outside of the designated storage closet where it is normally kept.

No one was in attendance at the gauge location when the area was checked by your inspector.

This is contrary to 10CFR 20.207.

Condition 10 of this license states that gauges with these radioactive sources be used only at authorized licensee facilities and at temporary jobsites.

Contrary to this requirement, these gauges are taken home on occasion by employees who operate these gauges because of their work schedules. This practice is not authorized by our license.

A memo was sent to the supervisors and technicians of the Soils and Geology Department who operate and are responsible for the safe handling of this equipment by the manager of the department stating that the gauges must be locked in the designated closet in the laboratory whenever the gauges are not being used. The door to this closet is locked and posted with a "Caution - Radioactive Materials" sign.

On occasion a technician takes a gauge to various jobsites when there is a heavy workload. This situation occurs predominately in summer. If the technician works quite late, he has taken the gauge home with him and stored it at home overnight.

While this is not done on a regular basis, it never-the-less constitutes an item of non-compliance with the conditions of our license.

C. License 22-01376-04 (cont)

The corrective action I would propose would be to request an amendment to License 22-01376-04 authorizing a private home as a temporary site for storage of licensed material provided it is locked and secured in a cabinet or closet and the door to such storage facility is posted with a "Caution - Radioactive Materials" sign. Further, access to this cabinet or closet must be limited to the operator of the gauge containing licensed material.

This amendment will be sent under separate cover.

The corrective action taken for the violation under License No. 22-01376-03 has been completed.

By my taking the responsibility of maintaining leak test records for these sources in addition to the radiography and soil moisture/density sources should prevent a re-occurrence of this deficiency.

The corrective action taken to correct the violation of failure to maintain control and direct surveillance of licensed material stored in our laboratory has been accomplished by the manager of the department. This action consisted of distributing the notice of violation to each supervisor and technician with instructions to keep the storage facility locked at all times.

The question of storage of licensed material at temporary locations under controlled conditions will be resolved if our proposed amendment to this license meets with NRC approval.

If you have any further questions regarding this response, please contact me.

Very truly yours



Howard T. Schulze
Radiation Safety Officer

HTS/jak

Attachments

X Check Attached Bill me on PO #

HS-9
1/74

LEAK TEST CERTIFICATE

SOURCE DATA

Source owned by Twin City Testing Corporation
Street Address 662 Cromwell Ave Phone # 62-645-3601
City ST PAUL State MA Zip Code 55114
Source manufactured by (Company Name) NEW ENGINE MODEL
Source Model No. 007-0282 Source Serial No. 3920 SCHE
Isotope NI-63 Activity (mCi) 15
Date of Test 12-6-85 Performed by W. WEBB
(Print Name)

Note: Send results to Howard T. Schutze R.S.O.

TEST DATA

Sample Activity 2.3 X 10⁻⁵ μ Ci or 50 dpm
Counting Log No. BKG

0.005 μ Ci or 11,000 dpm is classified as a Leaking Source

The source was:

Leaking ☐

Not Leaking ☒

JAN 23 1986

DATE

Mc Rayson

Health Physicist



ICN Pharmaceuticals, Inc.
Health Physics Services

2727 Campus Drive
Irvine, California 92715
Tel: (714) 833-2500

X Check Attached Bill me on PO #

HS 9
1/74

LEAK TEST CERTIFICATE

SOURCE DATA

Source owned by TWIN CITY TESTING Corporation
Street Address 662 CROMWELL AVE Phone # 612-645-3601
City ST PAUL State MN Zip Code 55114
Source manufactured by (Company Name) NEW ENGLAND NUCLEAR
Source Model No. 330-0119 Source Serial No. Sigma 4B
Isotope Ni-63 Activity (mCi) 10 (dark block)
Date of Test 12-6-85 Performed by W. WELLES (Print Name)
Note: Send results to Howard T. Schutze R.S.G.

TEST DATA

Sample Activity 2.3×10^{-5} BQ 50 dpm
Counting Log No. BKG

0.005 μ Ci or 11,000 dpm is classified as a Leaking Source

The source was:

Leaking ☐
Not Leaking ☒

JAN 23 1986

DATE

Mc Royse
Health Physicist



ICN Pharmaceuticals, Inc.
Health Physics Services

2727 Campus Drive
Irvine, California 92715
Tel. (714) 833-2500