



ANALYTICAL INSTRUMENT DEVELOPMENT, INC.

RT. 41 & NEWARK RD., AVONDALE, PA. 19311

PHONE: (215)263-3181

TELEX 835441 AID INC

July 18, 1985

Mr. John Kinneman
Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Docket No. 30-19307
License No. 37-13360-03

Dear Mr. Kinneman:

This is in response to your letter of June 10, 1985, subject Inspection Number 85/01 by R.H. Ladun. I appreciated the visit of Mr. Ladun and the critique that followed. I think that he has helped us alot in getting our activities in proper prospective. Previous to his visit we moved in a direction of compliance but had not obviously met all of the requirements. I cannot explain the reason why the letter of April 30, 1982 was not responded to. This certainly is an oversight and we certainly wish to correct any activities that were not corrected as a result of the lack of response.

The following is an item by item response to the Appendix A notice of violation. I think we have covered all of the areas completely. The intent here is to try to get a better understanding of the language of your notice. We have difficulty completely understanding exactly what is intended or the subsequent action that is required.

Appendix A Item 2. It is obvious from the statement in Item 2 that our method of maintaining a log of instruments is inadequate. As you can imagine an instrument company who has responsibility for a large number of demo equipment we have been maintaining an active invoice file. We need of course to keep track of instruments that go in and out of the building not only to determine their location but for proper IRS statements at the end of the year. In interpreting this activity as being inadequate we have established a hardback bound log which in addition to the invoice will contain a log of instruments that are on the premises and instruments that have been sent out into the field.

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37-13360-03 PDR

Mr. Kinneman
July 18, 1985

With respect to your comment concerning that this field activity and that the instruments should be under the supervision and control of a authorized Analytical Instrument Development, Inc. Representative who is listed on the license condition number 11. I do not see that we have failed to meet this requirement. All instrument activities and the movement of instruments are the direct responsibility of the radiation safety officer and in his absence Dr. Fredrick J. Debbrecht who is also found on AID's license. It's hard for me to understand why everyone who comes in contact with our instrumentation and is under our direction has to be listed on the license. This not only would become burdensome but would be somewhat ludicrous. I would appreciate an interpretation of your statements.

Item 1. In the conversation with the inspecting officer, R.H. Ladun, it was our understanding that the concern over the operation of the proportional gas flow beta counter was that there is a possibility that we could remove cells from our glove box without the proper wipe test or at least without the verification that the level of radiation is not in excess. It was pointed out to Mr. Ladun that we have given up using the proportional gas flow beta counter because of it's inability to perform. It was continually being repaired and became quite costly and troublesome. As a result we changed our program and use Teledyne Isotopes in Westwood, New Jersey. We perform wipe tests and send these to Teledyne for counting.

Possibly one of the concerns that is being expressed here is the fact that our license says that we are going to use a proportional gas flow beta counter. If this is the case, then it appears that we should ammend our license to remove the proportional gas flow beta counter use from the license. I would appreciate it if you could claefify this issue.

Item 3. As can be noted in the attached procedural changes for the operation of the wipe test activity, all received goods now will have a wipe test performed on them. Because the proportional gas flow beta counter is not in operation we will have to store these items in the glove box until the report from the wipe test is returned to us. Activity will be recorded in our log.

Item 4. The same procedure will be performed on goods returned as illustrated in the procedures attatched. The canisters will not be shipped until an approved wipe test is received from Teledyne Isotopes.

Mr. Kinneman
July 18, 1985

I have a concern regarding your inspection. The inspection took place on May 3, 1985 and your letter is dated July 10, 1985. A considerable amount of time has elapsed between the inspection and the subsequent letter. During Mr. Ladun's visit he was quite concerned about the cleanliness of our Isotope activity and made a number of wipe tests throughout the area. I have to assume that there was no problems encountered concerning these wipe tests, though I find it a little disconcerting that no statement was made relative to these wipe tests at least advising us that there wasn't a problem. Could you possibly on our behalf ask Mr. Ladun the results of these wipe tests so that I can put our personnel at ease and enter your response in our log book.

I hope that you don't find the above paragraph compromising I feel it's something that needed to be pointed out. I appreciate that my letter in response to yours is going to be displayed in the Public Document Room.

I hope the above explanations and comments are sufficient so that you can answer our concerns and give us some advice and guidelines in these areas. As is evident from the attached procedure we have placed all of the mentioned activities on the procedure into action as of this date. If any of these are improper we would welcome the opportunity to correct them.

As a point of personal interest and if you have the time when you are preparing your response if you could explain to me what the Paperwork Reduction Act of 1980 entails. I don't understand at all what that paragraph relates to.

Thank you for your assistance in these matters. I appreciate the opportunity to comply with your requests. If you wish to talk to me directly, please do not hesitate to call. In the meantime I will await your prompt response.

Sincerely,



Edward M. Neel/President AID

CC: Dr. Fredrick J. Debbrecht
Chuck Sarnoski
Larry Hagelgans

En: Memo on Radioactive Foils
Test Procedures



ANALYTICAL INSTRUMENT DEVELOPMENT, INC.

RT. 41 & NEWARK RD., AVONDALE, PA. 19311

PHONE: (215)268-3181

TELEX 835441 AID INC

July 19, 1985

TO: JIM LILLARD (RECEIVING)
TAMMY PARSONS

CC: EDWARD NEEL
FRED DEBBRECHT
TIM RYAN
CHARLES SARNOSKI
GLEN SUTH

FROM: LARRY HAGELGANS *LW*

SUBJECT: RADIOACTIVE FOILS

The following are procedures that must be maintained:

Item 1. Upon receipt of foils they must be taken immediately unopened to radioactive hood. Once there, they must be tested using following criteria. Following general procedure, as in 510-9042, test outside of can and inside can lid. Immediately close container and send test out.

NOTE: Foils cannot be used until test results are back and show no contamination.

Item 2. Prior to sending foils back to Safety Light for disposal the following must be done. Refer to test procedure 510-9043.

1. Record in notebook S/N of all foils being disposed of
2. Swipe test as outlined in Item 1 to be performed
3. Upon receipt of results of test foils can be sent back

Item 3. Foiling and refoiling detectors

Each time foils are opened 510-9040 test MUST be done. Before detectors are removed from hood test results must be received and recorded in lab notebook. Lab notebook should be set up in the following manner:

510-9042

Date Foil Received _____

Date Tested _____

Date Received Results _____

Results _____

510-9040

Foil S/N	Cell S/N	Date Loaded	Date Rec'd	Date Used	Customer

510-9043

Foil S/N (List All) _____

Date Tested _____

Date Received Results _____

Results _____

Test Procedure Outgoing Foils 510-9043

1. Test must be done before returning any foils to Safety Light for disposal.
2. When used foils build up to a quantity of 20 they should be sent back for disposal.
3. Test results must be in house before removing foils from hood.

Test Procedure

- A. Test is done inside radioactive hood.
- B. Material 9222-0014 2 ea. swipes and sample bags.
- C. Record in lab notebook serial number of all used foils being returned.
- D. Label sample bags and perform test on followings:
 1. Inside can lid
 2. Outside can lid
- E. Seal can and send test samples to:

ATTN: J. David Martin
Teledyne Isotopes
50 Van Buren Ave.
Westwood, NJ 07675

- F. Upon receiving results record them and the release date (day results received) in lab notebook.
- G. Used foils can now be sent back to Safety Light for disposal.

Test Procedure Incoming Foils 510-9042

1. Test must be done immediately upon receipt of foils.
2. Receiving should notify appropriate technician.
3. Foils cannot be used until test results are inhouse and show foils are not contaminated.
 - A. Test is done inside radioactive hood.
 - B. Materials - 9222-0014 2 ea. swipes and sample bag.
 - C. Procedure
 1. Label bags as follows:
 - a. Inside can lid
 - b. Outside can lid
 2. Wearing gloves perform test by wiping:
 - a. Inside can lid
 - b. Outside can lid
 - D. Send samples and PG # thru mail to:

ATTN: J. David Martin
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50 Van Buren Ave.
Westwood, NJ 07675

- E. Dates and results to be recorded in lab notebook.

TEST PROCEDURE FOR RADIOACTIVE GLOVE BOX - 510-9040

1. Test must be done when foiling detectors either new or service.
2. Test to be done by technician handling foil immediately after handling foil.
3. Test to be done at the following locations:
 - A. Floor of glove box
 - B. Entrance to glove box
 - C. Table top in front of glove box
4. Test procedure:
 - A. Materials:

9222-0014 1) 3 filter papers to be used as swipes
9222-0014 2) 3 sample bags
9300-0008 3) disposable gloves
 - B. Procedure:
 - 1) Using disposable gloves, place swipe on area to be tested and wipe in one direction, entire width of paper (4 cm), for a length of 10" (25 cm).
 - 2) Place swipe into sample bag and record the following information on it:
 - A. Location (see 3)
 - B. Date
 - C. Time
 - D. Surveyor (technician doing test)
 - 3) Record above information on tritium foil log book leaving enough room for data.
 - 4) Send the 3 samples with PO via mail to:

ATTN: J. David Martin
Teledyne Isotopes
50 Van Buren Ave.
Westwood, NJ 07675
 - 5) When test results are received back they are to be recorded in appropriate place in tritium log book and statement of results to be placed in their own file (see manager).

Larry Hagelgans
January 8, 1985