

Radiation Technology, Inc.

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October 2, 1984

Mr. Thomas E. Murley
United States Nuclear Regulatory
Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

RE: License No. 29-13613-02, Docket No. 030-07022 CAL No. 84-16

Dear Mr. Murley:

Having been away for the latter part of last week, I have now had an opportunity to review your letter concerning our recent plant inspection as well as the response submitted by Mr. George Sadek.

I would like to take this opportunity to respond to your letter of September 26, 1984 with particular reference to item 3 concerning our demineralization system. We would like to make it clear that at no time was our pool water out of specification, as indicated by Mr. Sadek, and that the most recent water sampling revealed a conductivity of 65,000 OHM-CM. This reading was taken the day after the inspection. Our license condition does not specify a flow rate conduction nor the duty cycle for the demineralization system and only requires that the conductivity of the water be greater than or equal to 50,000 OHM-CM. As Mr. Sadek has indicated, we have replaced the pump on the demineralization which is simply a routine maintenance item and should not be construed as an item of non-compliance.

The wiring on the cell water level alarm has been replaced and the wiring repositioned in order to give what we hope to be some additional operational life within the radiation field. We also wish to point out that our pool water system has two alarms, one on the cell and the other on the R&D pool. Since both pools are connected with an interlock, the water level alarm in the R&D pool accurately detects the water level situation in the cell pool as well. During the inspection the R&D pool water level alarm was tested and was working satisfactorily. We wish the record to note this fact.

As explained to Mr. Allan and to the inspectors during their visit, we have contemplated a design change from the swinging door interlock system now being used on the upper and lower product conveyors due to maintenance problems with the "pigtails".

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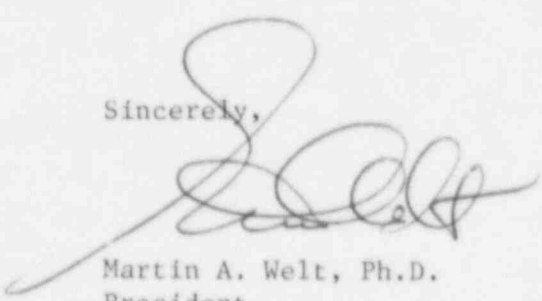
Mr. Thomas E. Murley
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October 2, 1984
page 2

We plan to go to a photoeye system in the form of a "light gate" similar to the system successfully used at our Arkansas and North Carolina facilities. We have also planned to replace our existing electro-mechanical control system which has been in service since 1970 with a solid state computer control system similar to our other plants. We have recently confirmed that the door interlock system proposed for Rockaway would be compatible with the new computer control system and it was this finding which held up the modification to the existing situation which is described in our license. We have decided to replace the pigtail microswitch with a roller type which we hope will prove to be more reliable until the facility modification is completed.

I have been informed that your inspectors contacted certain of our employees at their home and requested private interviews. We find this practice to be highly unusual and believe that a continuation of such a practice is without due cause and can have a highly demoralizing impact on employees and serves no beneficial purpose. I would appreciate your comments concerning this action with whatever clarification may be in order so that I can properly explain to my employees why the calls were made and for what beneficial purpose.

If you have any further questions concerning the above, please do not hesitate to contact me.

Sincerely,



Martin A. Welt, Ph.D.
President

MAW:mlk