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## Raytheon

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429:JBF:85:ODS:85:75

October 3, 1985

United States Nuclear  
Regulatory Commission  
Region One  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Attention: Mr. John E. Glenn

Dear Mr. Glenn:

Subject: Docket Numbers 030-04610 and 030-17099  
License Number 20-01896-03 and 20-01896-05E

In response to your routine safety inspection conducted on February 28, 1985, at our Quincy, Massachusetts Facility, we are taking the following actions to correct the violations noted in Appendix A of your September 4, 1985 letter to Richard J. Merrow. Please note, Mr. Merrow has retired and further correspondence regarding this license should be directed to the undersigned.

License No. 20-01896-03

- A. 1. Since we plan to phase out this product line in early 1986, we, therefore, have limited our licensed inventory to the minimum. Our inventory, therefore, is an in-process inventory (i.e., Nickel 63 - We have procured finished parts from New England Nuclear for assembly into the end product in a quantity sufficient to cover only in-house orders.) There is no Cesium 137 inventory since there is no production planned or anticipated. The in-process inventory is kept in the locked cabinet in the Chem. Lab. No large orders are anticipated.
2. Weekly stock and floor inventory records will be reinstituted to supplement the monthly computer records maintained by production Control. The Radiation Officer will conduct and document quarterly audits of above inventories.
3. Experience over the past five calibration cycles reflected an 18-day slippage per calibration cycle. Our internal procedures will be tightened to ensure that the outside calibration service will be accomplished within the 120 day cycle.

4. Administrative controls have been instituted to ensure that the cabinet containing the shielded bottle of Ce 137 is kept locked when not in use. This will include a formal notice posted on the cabinet and indoctrination of using employees.
5. The monthly surveys were performed regularly through December, 1984. Administrative controls will be instituted to ensure that the surveys will be conducted in the event of absence or any other temporary loss of the assigned individual. The surveys are usually scheduled for the last workday of the month. The January 1985 survey was not conducted due to absence of the employee who normally conducts the survey.
6. The large DOT 17H waste container has been removed to a secure location outside the main building. Temporary containers in the work area will be removed periodically to such larger containers. This administrative oversight will be corrected.

License No. 20-01896-05E

- B. This license has been renewed by your agency subsequent to the inspection. Reference is made to our application for renewal of subject license dated March 14, 1985, to your Agency concerning the lapse in renewal.

Licenses No. 20-01896-03 and 20-01896-05E

- C. Shipment of tubes containing exempt quantities of Cobalt 60 (byproduct material) were made as indicated in our annual reports to the NRC in 1980, 1982, 1983, and 1984. These tubes were shipped from finished goods inventories manufactured in prior years under NRC License No. 20-01896-03. In our renewal application for this license submitted April 28, 1978, we specifically noted in our covering letter:

"It should be noted that there are no substantial changes in our operations from those outlined in prior transmittals, and approved per License 20-01896-03, except for Cobalt 60 where we have discontinued production."

In addition, in our renewal application dated September 6, 1979, for License No. 20-01896-04E, for the continuing distribution of electron tubes manufactured on License No. 20-01896-03 (renewed on July 3, 1979), we cited in Paragraph 7.2 that we were converting tube types from Cobalt 60 to Krypton 85.

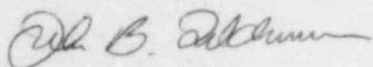
Due to an oversight we failed to indicate that we had tubes in finished goods inventory that contained Cobalt 60 (even though we were no longer manufacturing same). The license renewal for distribution should have included tubes containing Cobalt 60 from this inventory. We apologize for this oversight.

J. E. Glenn, NRC  
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We have no inventory of tubes containing Cobalt 60, and as reflected in our current License No. 20-01896-03, we do not plan any production of tubes containing Cobalt 60.

I feel these corrective actions have resulted in full compliance with the conditions of our licenses. Please contact me at the above address if you have any questions or comments.

Very truly yours,



John B. Feldman, Manager  
Corporate Occupational  
Safety and Health

cc: E. deLollis  
W. Hartford  
F. Iseman