ISOMEDIX

30-19214

July 27, 1984

Mr. Paul R. Quinn
Materials Licensing Section
U.S. Nuclear Regulatory Commission
101 Marietta Street, NW
Suite 2900
Atlanta, Georgia 30323

RE: License 29-19769-01

Dear Mr. Quinn:

Per your request, please make the following change on the subject license:

Applicants Mailing Address: Change to

Isomedix (Puerto Rico), Inc.
State Road 690 Km. 1.7
Barrio Sabana Hoyos
PO Box 415
Vega Alta, PR 00762

If possible, we would still like to receive copies of correspondence at our Whippany address, inasmuch as replies, etc., come from this office.

I would also like to request two other amendments, for which Miss Glenda Jackson has stated that a fee of $230. is applicable. (Check enclosed.)

In Item 7 of our Form NRC-313 application, we list Luis Watlington as the on-site RPO. We would like him deleted. Our current Plant Manager, Angel Mendoza, may not be with us much longer, and for the past two months we have rotated George Baker, Jon Young and David Pearse as the acting plant managers, even though Mendoza is still present. Young was the Plant Manager and on-site RPO at Spartanburg, SC, for four years, and is currently licensed as the on-site RPO and Plant Manager in our Whippany, NJ, unit. Pearse has been Plant Manager and on-site RPO in our Toronto unit since its opening 2½ years ago.

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We need some flexibility regarding the on-site RPO in Puerto Rico, and to obtain this, I propose the following:

> The on-site RPO shall be George Dietz, John Masefield, William Owens, George Baker, or any of the other currently licensed Isomedix Plant Manager/On-Site RPO's, provided that any individual in the latter group shall have served in the capacity of Plant Manager/On-Site RPO for at least one year, and is approved by the Corporate Radiation Safety Committee.

The justification for this request is:

a. With the exception of our Parsippany, NJ unit, all nine of our licensed and operating units have been provided by AECL.

b. The radiation safety systems of all units are virtually identical.

c. All plant managers go through the same radiation safety training.

d. Our radiation safety procedures at all nine plants are identical (with obvious minor differences, such as specific numbers to call in an emergency).

e. Our operating record with these AECL plants, plus the Plant Manager/On-Site RPO's, attests to the adequacy of safety system design and competence of the individuals involved.

Next, Item 12 of our license condition contains the phrase "...in the physical presence of...".

In the past, we have had discussions with several NRC licensing people on the interpretation of this phrase, and my impression is that the definition was extended to include our being able to operate the unit unattended, provided that an on-call operator was reasonably available. On-call personnel are also equipped with portable "beepers".

Paragraph 4.7.11 of the Supplemental Information to our Form 313 (copy enclosed) is fairly specific of our intent to operate unattended.

We believe these procedures meet the criteria of being reasonably available, and that the data presented in the license application indicate that unattended operation is a part of our operating plan.

Other items also bear on this logic. First, all AECL irradiators, whether batch or automated, are designed to run unattended.

In the case of Puerto Rico, when the last loaded carrier enters the system, or in the event of a malfunction, the source automatically drops into the safe position.

Entry into the cell (whether by an authorized or unauthorized person) is prevented by the safety system if there are radiation levels above the preset level of the in-cell monitor. Notwithstanding this, entry into the electromechanically controlled cell by a stranger is doubtful because he would not know the entry procedure.

Radiation safety, then, is maintained at all times.

It is requested that in Condition 12, the phrase ..."and in the physical presence of"... be deleted.

Thank you for your consideration.

Very truly yours,

ISOMEDIX INC.

George R. Dietz
Executive Vice President

GRD:js

Enclosures

The radiation room walls, ceiling and floor are constructed of concrete as shown on the drawing. The equipment inside the radiation room is mainly metal with a small amount of organic material such as insulation on wires, etc. This organic material will not sustain combustion when the ignition source is removed.

4.7.11 Security System

The irradiator system has been designed for total automation and hence unattended operation. The input accumulator conveyor can hold some 18 loaded carriers, ready for processing. These are fed into the irradiator in a controlled sequence, and completed carriers are directed into the output accumulator. Any malfunction--inside or outside of the irradiator--will automatically cause the source to return to the storage position.

We do plan to have unattended operation.

The security system planned includes the following:

(1) The property is surrounded by a 6' high chain-link mesh fence, topped with 1-foot high barbed wire (three strands, off-set).

(2) All doors and windows which give access to the warehouse area, which houses the irradiator, will be interlocked with a burglar alarm system. Any violation of the system automatically triggers a telephone system to call the plant manager or the licensed operator who is designated to be on standby and respond to abnormal operations for that period. The system also ties into the local police station, giving them notification of a possible unauthorized entry.

If unauthorized access is made into the warehouse, the security system relating to the irradiator itself will prevent entry into the unit while the source is exposed.

4.7.12 Roof Plug Interlock

An interlock on the roof plug senses when the plug is in the fuily seated position. The source cannot be raised unless the plug is in its fully seated position.