

March 3, 1988

UNITED STATES
NUCLEAR REGULATORY COMMISSION
DOCUMENT CONTROL DESK
WASHINGTON, DC - 20555

SUBJ: REPLY TO A NOTICE OF VIOLATION
DOCKET No. 030-19320 /LICENSE NO. 52-19845-01

ATTN.: DOCUMENT CONTROL DESK

Gentlemen:

The following responds to your letter dated February 10, 1988 on the above subject.

We do admit that there were the violations listed by you, the main reason being that we had been unable to assign a permanent person to follow up on the NRC procedures. However, right after the meeting held by Mr. R. Brown on January 12, 1988, we have taken a keen concern on what this means. Thus, we have held several meetings to address this matter accordingly.

The results of our meetings have been the following:

- (1) Right on January we assigned permanently Mr. Oscar Acevedo to coordinate the due dates when reports are to be submitted to your offices. This includes the leak tests. Please find enclosed a copy of our last tests performed by Mr. Santiago Gómez, a licensed Radiation Physics Consultant. As a matter of fact, we have hired his services to keep us abreast with your requirements in order to comply with the NRC laws. This means, that from now on, Mr. Gómez will work in constant communication with us. He will also keep records, files on anything related to NRC/ Betterroads correspondence, license, etc.



P.O. BOX 21420, RIO PIEDRAS, P.R. 00928 TEL.. (809) 760-1050 TELEX-385-9197



Quality is not an accident, it is the aim of our people.

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BETTERROADS ASPHALT CORP.

March 3, 1988

page two

- (2) Starting January 1988, we have contacted again our F.B. Processor, Landauer, Jr. & Co. -- (800) 323-8830 and sent them badges for processing and recording of individuals' radiation exposures. We are waiting for the first Radiation Dosimetry Report. (Please, also find enclosed copies of our paperwork sent to them.)
- (3) We have already started in our offices a file containing a physical inventory which accounts for all sources received under our license. As stated earlier, all this records will be coordinated with Mr. Santiago Gómez.
- (4) We have also developed shipping papers to be used each time that the material is transported outside our premises (copies are enclosed). We have also given specific instructions to those operating the equipment that as to what is expected of them. Mr. Acevedo will ensure that this requirement is followed carefully. At the same time, instructions have been given to review the terms and conditions laid for each licensee.

As you can see we have already taken complete control of the situation in a manner not accomplished before and which will insure a steady compliance of the law.

In view of what has been stated, the positive steps taken, we will be extremely grateful to know that you have granted us favor on the decision you make.

FOR THE BETTERROADS ASPHALT CORP.

Respectfully yours,

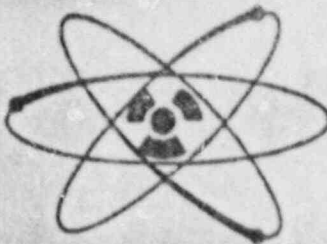
Ottmar Chávez
Executive Vice-President

cc: Regional Administrator, Region II
P.O. BOX 21420, RIO PIEDRAS, P.R. 00928 TEL. (309) 760-1050 TELEX-385-9197



Quality is not an accident, it is the aim of our people.

SANTIAGO GOMEZ
Radiation Physics Consultant
NRC-License No. 52-17420-01



1821 Colonia St. - College Park
Rio Piedras, P.R. 00921
Tel. 809-751-0042

LEAK TEST CERTIFICATE

FOR

RADIOACTIVE SEALED SOURCES

ITEM TESTED:

CPN Sources: 10 mCi (Cs-137)/50 mCi (Am-241/Be)
(7-1-85) - Serial No. A35116370 - Campbell
Pacific Nuclear Corp.

LICENSEE:

BETTERROADS ASPHALT CORP.
P.O. Box 21420
Rio Piedras, P.R. 00928
NRC-License No. 52-19845-01

METHOD OF TEST:

Using filter paper or Q-tips wipe all external surfaces of the sealed source and/or the closest movable parts of the equipment where the source is contained. Then, measure the net activity on the samples in a Radiation Detection System capable of detecting less than 0.005 uCi.

STANDARD:

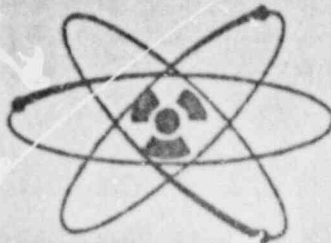
Cs-137, 5.0×10^{-3} uCi (6-70)/Am-241, 5.7 uCi (3-8)

RESULTS:

The test indicated the presence of not more than 3.4×10^{-6} uCi of Cs-137/Am-241
Source in compliance with NRC Stds.: Yes ☒ No ☐
NRC Regulations require that should any leak test reveal the presence of 0.005 uCi of removable contamination, the source must be removed from service.
Next leak test due August, 1988

DATE: Feb. 29, 1988 SIGNED:

SANTIAGO GOMEZ
Radiation Physics Consultant
NRC-License No. 52-17420-01



1821 Colonia St. - College Park
Rio Piedras, P.R. 00921
Tel. 809-751-0042

LEAK TEST CERTIFICATE

FOR

RADIOACTIVE SEALED SOURCES

ITEM TESTED:

CPN Sources: 10 mCi (Cs-137)/50 mCi (Am-241/Be)
(11-10-81) Serial No. M11124189 - Campbell
Pacific Nuclear Corp.

LICENSEE:

BETTERROADS ASPHALT CORP.
P.O. Box 21420
Rio Piedras, P.R. 00928
NRC-License No. 52-19845-01

METHOD OF TEST:

Using filter paper or Q-tips wipe all external surfaces of the sealed source and/or the closest movable parts of the equipment where the source is contained. Then, measure the net activity on the samples in a Radiation Detection System capable of detecting less than 0.005 uCi.

STANDARD:

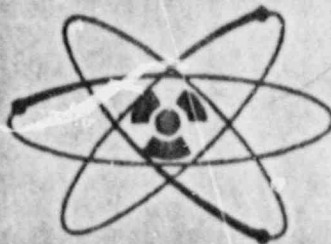
Cs-137, 5.0×10^{-3} uCi (6-70)/Am-241, 5.7 uCi (3.80)

RESULTS:

The test indicated the presence of not more than 1.0×10^{-5} uCi of Cs-137/Am-241 Source in compliance with NRC Stds.: Yes ☒ No ☐
NRC Regulations require that should any leak test reveal the presence of 0.005 uCi of removable contamination, the source must be removed from service.
Next leak test due August, 1988

DATE: Feb. 29, 1988 SIGNED:

SANTIAGO GOMEZ
Radiation Physics Consultant
NRC-License No. 52-17420-01



1821 Colonia St. - College Park
Rio Piedras, P.R. 00921
Tel. 809-751-0042

LEAK TEST CERTIFICATE

FOR

RADIOACTIVE SEALED SOURCES

ITEM TESTED:

CPN Sources: 10 mCi (Cs-137)/50 mCi (Am-241/Be)
(7-28-86) - Serial No. M17027380 - Campbell
Pacific Nuclear Corp.

LICENSEE:

BETTERROADS ASPHALT CORP.
P.O. Box 21420
Rio Piedras, P.R. 00928
NRC-License No. 52-19845-01

METHOD OF TEST:

Using filter paper or Q-tips wipe all external surfaces of the sealed source and/or the closest movable parts of the equipment where the source is contained. Then, measure the net activity on the samples in a Radiation Detection System capable of detecting less than 0.005 uCi.

STANDARD:

Cs-137, 5.0×10^{-3} uCi (6-70)/Am-241, 5.7 uCi (3-80)

RESULTS:

The test indicated the presence of not more than 6.0×10^{-6} uCi of Cs-137/Am-241 Source in compliance with NRC Stds.: Yes ☒ No ☐
NRC Regulations require that should any leak test reveal the presence of 0.005 uCi of removable contamination, the source must be removed from service.
Next leak test due August, 1988

DATE: Feb. 29, 1988 SIGNED:

BETTERROADS ASPHALT CORP.

(Radiation Protection Program)

SEALED SOURCES INVENTORY REPORT

Year: 1988

<u>Source Identification</u>	<u>Location</u>	<u>Operator</u>	<u>Remarks</u>
1. CPN Sources: 11-10-81 Unit S/N M11124189	PLANTA # 1, Cupey.	Angel O. Acero	
2. CPN Sources: 7-1-85 Unit S/N M35116370	PLANTA # 2, Aguada.	Noel Alvarado	
3. CPN Sources: 7-28-86 Unit S/N M17027380	PLANTA # 7, SAN THOMAS.	Francisco Gutierrez	
4.			

Performed by: _____

Date: _____

<u>Source Identification</u>	<u>Location</u>	<u>Operator</u>	<u>Remarks</u>
1. CPN Sources: 11-10-80 Unit S/N M11124189			
2. CPN Sources: 7-1-85 Unit S/N M35116370			
3. CPN Sources: 7-28-86 Unit S/N M17027380			
4.			

Performed by: _____

Date: _____

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R. S. Landauer, Jr. & Co. **Tech/Ops**
Division of Tech/Ops, Inc.
2 Science Road, Glenwood, Illinois 60425-1586
(312) 755-7000

BETTERROADS ASPHALT CORP
PO BOX 44
RIO PIEDRAS PR 00928

Accredited by the
National Bureau of Standards
through **FVLAD**

USE THIS SIDE FOR DELETIONS
PLACE "D" IN DELETE COLUMN

USE REVERSE SIDE FOR ADDITIONS
AND OTHER CHANGES.

SERVICE CHANGE ORDER

[illegible]

IMPORTANT: WHEN REQUESTING ANY CHANGES, ADDITIONS, OR DELETIONS, PLEASE MAKE THEM ON THIS FORM.
CHANGES TO BE EFFECTIVE FOR YOUR NEXT WEAR DATE.
MUST REACH THE GLENWOOD OFFICE NO LATER THAN 02/13/88

PLEASE DO NOT DUPLICATE CHANGES REQUESTED DURING PRECEDING 30 DAYS

DO NOT RETURN CHANGE REQUESTS WITH YOUR DOSIMETERS SINCE THIS DELAYS HANDLING

ONE HOLDER IS LOANED AT NO CHARGE FOR EACH FILM IN SERVICE AND MUST BE RETURNED AT TERMINATION OF CONTRACT. EXTRA HOLDERS MAY BE PURCHASED ON REQUEST. WITH THIS SHIPMENT OUR RECORDS INDICATE THE FOLLOWING LOANED FILM HOLDERS IN YOUR POSSESSION:

02/13/88

G (REGULAR)	H (THERMAL)	I (NEUTRAL 100)	OTHER
2			

FOR ADDRESS CHANGES ONLY

PLEASE TYPE OR PRINT

SHIPPING ADDRESS (MAXIMUM 5 LINES OF 23 CHARACTERS)

1			
2			
3			
4	CITY	STATE	ZIP CODE
5	BILLING ADDRESS (MAXIMUM 5 LINES OF 23 CHARACTERS)		
1			
2			
3			
4	CITY	STATE	ZIP CODE
5	REPORTING ADDRESS (MAXIMUM 5 LINES OF 23 CHARACTERS)		
1			
2			
3			
4	CITY	STATE	ZIP CODE
5			

A BADGE NUMBER IS ASSIGNED PERMANENTLY AND CANNOT BE ASSIGNED TO A NEW PERSON. NAME CHANGES MAY BE MADE ONLY TO CORRECT SPELLING OR DUE TO MARRIAGE. DOSIMETERS MAY BE RETURNED IN ORIGINAL SHIPPING CONTAINER, BUT OLD LABELS AND POSTMARKS MUST BE COVERED AND PROPER POSTAGE AFFIXED.

Enclosed 90
2/25/48

SHADED AREAS FOR CUSTOMER USE ONLY

ADD. CODE NO.	FREQ.	REGISTRATION NUMBER	NYC LICENSE	EXPIRATION DATE	FPU CODE
42367			52-19845-01		

ADD	REACTNATE	ASSIGN	NUMBER	PARTICIPANT'S NAME (LAST NAME, INITIALS - MAXIMUM OF 16 LTR. CHRS & SPACES)	BADGE TYPE (3)	SERIES	FIRST WEAR DATE	TOTALS N	SOCIAL SECURITY NO.	SEX	BIRTH DATE MO. DAY YR.	BADGE DATA / NAME CHANGE (4)
A				Cortés, P.					584-34-1153	M	8 6 51	
A				Torres, E.					581-25-0654	M	9 2 63	
A				Gayá-Soto, E.					584-13-4796	M	10 19 59	
A				Acevedo, O.					582-21-5254	M	6 23 61	

(1) A.D. PLACE AN "X" TO ADD NEW PARTICIPANT. REACTNATE PLACE AN "X" TO REACTNATE A PARTICIPANT PREVIOUSLY ON UNCLASSIFIED SERVICE. THE ACCOUNT AND GROSS PREVIOUS PARTICIPANT NUMBER. ASSIGN PLACE AN "X" TO ADD PERSONAL INFORMATION NOT PREVIOUSLY PROVIDED FOR PARTICIPANT ALREADY ON SERVICE, AND GIVE PARTICIPANT NUMBER.

(2) NEW OR ADDITIONAL NUMBERS WILL BE ASSIGNED THE NEXT HIGHER NUMBER IN YOUR SEQUENCE. REASSIGNED NUMBERS ARE TO BE 1625 ONLY WHERE SPECIAL ARRANGEMENTS HAVE BEEN MADE.

☐ ADDITIONS CURRENT WEAR DATE

☒ ADDITIONS NEXT WEAR DATE

NOTE: UNLESS OTHERWISE INDICATED, ADDITIONS WILL BE MADE IMMEDIATELY FOR THE MOST RECENT WEAR DATE SHIPPED.

- (3) BADGE TYPE (Use both Alpha and Numeric Code)
- (ALPHA CODE)
- A - X GAMMA BETA FAST NEUTRON (NEUTRAK 1)
 - B - X GAMMA BETA FAST NEUTRON (NEUTRAK 144)
 - C - X GAMMA BETA FAST (NEUTRAK 144)
 - D - THERMAL NEUTRON
 - E - REACTOR TLD
 - F - NEUTRAK 1
 - G - REAL TOR TLD FAST NEUTRON (NEUTRAK 144)
 - H - X GAMMA BETA
 - I - X GAMMA BETA FAST (NTA FILM)
 - J - THERMAL NEUTRON
 - K - NEUTRAK ER
 - L - X GAMMA BETA FAST (NEUTRAK 1)
 - M - THERMAL NEUTRON
 - N - TLD (3 CHIPS)
 - O - TLD (3 CHIPS) FAST NEUTRON (NEUTRAK 144)
 - P - X GAMMA BETA FAST NEUTRON (NTA FILM)
 - Q - DEX RAY
 - R - X GAMMA BETA (FRM) NEUTRON (NEUTRAK ER)
 - S - X GAMMA BETA (TLD) NEUTRON (NEUTRAK ER)
 - T - TLD (2 CHIPS)
 - U - TLD (1 CHIP)
 - V - ALBEDO
 - W - ESCORT TLD
 - X - SPECIAL TLD
 - Y - X GAMMA BETA THERMAL NEUTRON
 - Z - TLD (3 CHIPS) FAST NEUTRON (NEUTRAK 144)
- (NUMERIC CODE)
- 1-BODY
 - 3-RIGHT FINGER (RING)
 - 4-LEFT FINGER (RING)
 - 5-RIGHT WRIST
 - 6-LEFT WRIST
 - 7-OTHER EXTREMITY
 - 8-OTHER TOTAL BODY
 - 9-MONITOR

(4) Badge Data
Any relevant data as to transfer, replacement, in operation date or previous exposure history or medical exposure sources show previous history in still form.

ARE HOLDERS REQUIRED FOR THESE ADDITIONS?

IF SO, NUMBER TYPE G1

[Signature]
(AUTHORIZED SIGNATURE)

2/23/88
(DATE)

FOR LANDAUER USE ONLY									
DATA ENTRY									
DETAIL	ADDRESS	HEADERS	HISTORY	DELETIONS	REPORTS				
SHIP FOLLOWING BADGE HOLDERS/SEE BADGE TYPE (3) ABOVE									
G/P	I	H/Y	Q	G/P WRIST	C	TYPE	OTHER	QUANTITY	NO CHANGE
SHIP FOLLOWING BADGE HOLDERS/SEE BADGE TYPE (3) ABOVE									
G/P	I	H/Y	Q	G/P WRIST	C	TYPE	OTHER	QUANTITY	CHANGE

CRABOUS
BOX AM
RIO PIECE