

From: SAN BRUNO ARCHIVE

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Notes: SFNSY circa 1961

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UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON 25, D.C.

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IN REPLY REFER TO:

DLR:CGW  
4-1039-2, -3  
70-415

68847  
385-153

JUL 12 1961 *mm*

JUN 12 1961

Commanding Officer  
San Francisco Naval Shipyard  
Production Department  
San Francisco, California

Dear Sir:

This refers to the inspection conducted on January 11 and 12, 1961, of your activities authorized under AEC Byproduct Material License Nos. 4-1039-2 and - 3, and Special Nuclear Material License No. SNM-379.

It appears that certain of your activities were not conducted in full compliance with the requirements of conditions of a license and the AEC's "Standards for Protection Against Radiation," Part 20, Title 10, Code of Federal Regulations, in that:

1. Byproduct materials used in radiography were not always used by or under the direct supervision of Charles P. Baldinger, in violation of License Condition No. 4-1039-2, Condition No. 12, "Authorized user."
2. Operation of the 128 curie Cesium 137 source for instrument calibration creates radiation levels in unrestricted areas outside a 6th floor window of Building 253 such that an individual could have received a radiation dose in excess of 2 millirem in any one hour and 100 millirem in any seven consecutive days, in violation of Section 20.105(b), "Permissible levels of radiation in unrestricted areas."
3. The two Cesium 137 sealed sources and the two Cobalt 60 sealed sources which were stored in Building 411 were not tagged as required by License No. 4-1039-2, Condition No. 16, "Tagging of sealed sources."

REGISTERED MAIL  
RETURN RECEIPT REQUESTED

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JUN 12 1961

4. Written administrative instructions supplied to individual byproduct material users differed from the written instructions submitted with your application dated July 26, 1960, and AEC approval was not obtained before the instructions were changed. This is in violation of License No. 4-1039-2, Condition No. 18, "Written Administrative Instructions."
5. The byproduct material storage area in the Electronics Shop, (Building 351-A) was not posted as required by Section 20.203(e)(1), "Caution signs, labels and signals."
6. Various containers in which byproduct materials were stored in the Structural Steel Shop, Building 411, the Calibration Room, Building 253, and the Electronics Shop, Building 351-A, were not labeled as required by Section 20.203(f)(1) and (f)(4), "Caution signs, labels and signals."
7. Form AEC-3, "Notice to Employees" had not been posted as required by Section 20.206(c), "Instruction of personnel; posting of notices to employees."
8. Records were not maintained of surveys conducted during the use of byproduct material and for the purpose of assuring that such material had been properly returned to storage containers, in violation of Section 20.401, "Records of surveys, radiation monitoring and disposal."

Pursuant to the provisions of Section 2.201(a), "Notice of violation," of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, you are requested to notify this office, within thirty days of your receipt of this notice, of the steps taken or to be instituted to achieve correction of the alleged violations and the date when such correction has been or will be achieved.

Commanding Officer

- 3 -

JUN 12 1961

With respect to Item No. 2, you may wish, pursuant to Section 20.105(a), "Permissible levels of radiation in unrestricted areas," to request Commission approval of radiation levels in unrestricted areas outside the window in excess of those allowed under paragraph (b) of the same Section.

Very truly yours,

*Eber R. Price*  
Eber R. Price  
Assistant Director  
Division of Licensing  
and Regulation

Enclosures:

1. 10 CFR 20  
2. 10 CFR 2  
3. Form AEC-3
- W*  
*V*  
*570*

CC: Mr. Vincent F. Saitta, Tech. Dir.  
Physics & Oceanography Branch  
Applied Sciences Division  
Code: 362B

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Atomic Energy Commission  
Division of Licensing and Regulation  
Washington 25, D. C.

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Gentlemen:

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This letter is in reply to your letter DLR:CGW/4-1039-2, -3/70-415 of 12 June 1961 in which you allege eight violations of conditions to the license.

1. Byproduct materials used in radiography were not always used by or under the direct supervision of Charles P. Baldinger, in violation of License Condition No. 4-1039-2, Condition No. 12, "Authorized user."

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This is a matter of radiographer training on which we have had exchanges of correspondence since October 1960. We have trained additional persons and furnished you with their names (Enclosure (3)). You have not added these names to our license. Enclosed, herewith, as enclosure (1) are the complete details of our training course. We believe that our course is adequate. If there is a different type or length of training course required, we need to be informed what it is in order to comply with it.

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2. "Operation of the 128 Cesium 137 source for instrument calibration creates radiation levels in unrestricted areas outside a 6th floor window of Building 253 such that an individual could have received a radiation dose in excess of 2 millirem in any one hour and 100 millirem in any seven consecutive days, in violation of Section 20.105(b), "Permissible levels of radiation in unrestricted areas."

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The above is considered erroneous. This installation, initially constructed in 1952, has been monitored many times and the results recorded. For example, attached as enclosure (2), are diagrams of the installation and radiation levels as of 13 March 1959. Conditions are the same now. The exterior of

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Initials hereon indicate that the person initialing has read and approved the correspondence and has no recommendation to make as to change therein.

the room is accessible on two sides only; on the other side there is a sheer drop of 85 feet to the ground below. Access doors are unlocked only while persons are actually passing through them. The radiation levels on the exteriors of the two accessible walls are shown on enclosure (2), Sheet 2, and it is to be noted that the highest reading is 1.8 mr/hr.

3. "The two Cesium 137 sealed sources and the two Cobalt 60 sealed sources which were stored in Building 411 were not tagged as required by License No. 4-1039-2, Condition No. 16, "Tagging of sealed sources. ""

The four sources were re-calibrated on 18 May 1961. New tags were attached on 26 May 1961.

4. "Written administrative instructions supplied to individual byproduct material users differed from the written instructions submitted with your application dated July 26, 1960, and AEC approval was not obtained before the instructions were changed. This is in violation of License No. 4-1039-2, Condition No. 18, "Written Administrative Instruction. ""

The content of the instructions was not changed, except to add your new requirement for radiation safety training for radiographers, which was received subsequent to July 26, 1960. The instructions were issued to Shipyard employees in our regular format. This was explained to your inspector. This was also explained in our letter of 21 February 1961 to you, and a copy of the instructions was enclosed.

5. "The byproduct material storage area in the Electronics Shop, (Building 351-A) was not posted as required by Section 20.203(e)(1), "Caution signs, labels, and signals. ""

The area was posted but the signs were the old style with the jagged lines through the radiation symbol. New signs, with the new symbol, have been made and installed.

6. "Various containers in which byproduct materials were stored in the Structural Steel Shop, Building 411, the Calibration Room,

Building 253, and the Electronics Shops, Building 351-A, were not labeled as required by Section 20.203(f)(1) and (f)(4), "Caution signs, labels, and signals."

Preparation of labels was held in abeyance until the sources were re-calibrated. Labels are now being made and will be installed in a short time.

7. "Form AEC-3, "Notice to Employees" had not been posted as required by Section 20.206(c), "Instruction of personnel; posting of notices to employees."

Form AEC-3 was actually posted in a number of places. An insufficient number of copies was received from AEC and we had to make copies. Your inspector objected to our photostat copies. Additional copies subsequently supplied by your inspector have been posted.

8. "Records were not maintained of surveys conducted during the use of byproduct material and for the purpose of assuring that such material had been properly returned to storage containers, in violation of Section 20.401."

Employees have been instructed to record survey readings taken during exposures.

It appears to us that all of the above items have been resolved or are in the process of being resolved, except for item 1. We request your cooperation and assistance in regard to this item.

Sincerely yours,

✓  
CHARLES A. CURTZE  
RADM USN  
Shipyard Commander

Encl:

- (1) Radiation Safety Training Course for Welders
- (2) Two sketches of AN/UDM-1A calibrator installation
- (3) SFNS ltr 387:hh:hb 385-45 10330 of 21 Feb 1961

Copy to:

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