

ARCO Petroleum Products Company
Harvey Technical Center
400 East Sibley Boulevard
Harvey, Illinois 60426
Telephone 312 333 3000



Research & Development
November 11, 1980

Mr. A. B. Davis, Chief
Fuel Facility and Materials Safety Branch
U. S. Nuclear Regulatory Commission,
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Sir:

In response to your letter of October 24, 1980, regarding an inspection of our NRC 12-00140-04 licensed activities, we have the following comments:

ITEM 1. "Survey instrument will be calibrated on a six-month frequency."

- (1) Corrective action taken and results achieved--survey instruments are being calibrated three times a year, at about four-month intervals. A procedure has been set up and calibration forms prepared.
- (2) Corrective action to be taken to avoid further non-compliance--an independent check on compliance will be made by our Safety Department, and reviewed by management.
- (3) Date when full compliance will be achieved--full compliance has been achieved since February, 1980.

ITEM 2. "Record is to be made of external radiation and removable contamination for all incoming shipments without exception."

- (1) Corrective action taken and results achieved--radiation lab personnel have been instructed to make gamma surveys and wipe tests of all incoming shipments of licensed material.
- (2) Corrective action to be taken to avoid further non-compliance--an independent check on compliance will be made by our Safety Department and reviewed by management.
- (3) Date when full compliance will be achieved--full compliance has been achieved.

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ITEM 3. "Not all radioactive isotopes were included on the inventory."

- (1) Corrective action taken and results achieved--isotopes not included in our June 1980 inventory have been added to the inventory.
- (2) Corrective action to be taken to avoid further non-compliance--persons handling isotope records have been made aware of this requirement.
- (3) Full compliance has been achieved.

ITEM 4. "All information required by Form NRC-5 was not included in licensee's records."

- (1) Corrective action taken and results achieved--necessary information has been forwarded to Landauer, Jr. and Co.
- (2) Corrective action to be taken to avoid further non-compliance--a plan has been set up to keep Landauer, Jr. and Co. informed of new permanent assignments of film badges, and termination of use.
- (3) Date when full compliance will be achieved--we have sent a letter to Landauer indicating persons who have permanent badge assignments together with social security numbers, sex, and birthdate.

Our response to IE Bulletin No. 79-19, after consulting with the NRC, was sent in our September 10, 1979 letter which is attached. In your recent request you asked that we institute procedures for shipping of low-level radioactive wastes. Shown below are our plans.

- (1) Maintain a current set of DOT and NRC regulations concerning the transfer, packaging and transport of low-level radioactive waste material.

We have these.

- (2) Maintain a current set of requirements (license) placed on the waste burial firm by the Agreement State of Nevada, South Carolina, or Washington before packaging low-level radioactive waste material for transfer and shipment to the Agreement State licensee. If a waste collection contractor is used, obtain the appropriate requirements from the contractor.

We have made only one shipment of waste material during 1978-79-80 (to date), and have plans only for a shipment of a cobalt-60 source. We will obtain the set of requirements before packaging for transfer and shipments.

- (3) Designate, in writing, people in your organization who are responsible for the safe transfer, packaging and transport of low-level radioactive material.

George A. Uhl, Lloyd A. Baillie, John D. Phelps .

- (4) Provide management-approved, detailed instructions and operating procedures to all personnel involved in the transfer, packaging and transport of low-level radioactive material. Special attention should be given to controls on the chemical and physical form of the low-level radioactive material and on the containment integrity of the packaging.

This has been done.

- (5) Provide training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements, and in your instructions and operating procedures for all personnel involved in the transfer, packaging and transport of radioactive material. Maintain a record of training dates, attendees, and subject material for future inspections by NRC personnel.

This has been initiated.

- (6) Provide training and periodic retraining to those employees who operate the processes which generate waste to assure that the volume of low-level radioactive waste is minimized and that such waste is processed into acceptable chemical and physical forms for transfer and shipment to a low-level radioactive waste burial facility.

This has been initiated.

- (7) Establish and implement a management-controlled audit function of all transfer, packaging and transport activities to provide assurance that personnel, instructions and procedures, and process and transport equipment are functioning to ensure safety and compliance with regulatory requirements.

This has been initiated.

- (8) Perform, within 60 days of the date of this bulletin, a management-controlled audit of your activities associated with the transfer, packaging and transport of low-level radioactive waste. Maintain a record of all audits for future inspections by NRC or DOT inspectors. (Note: If you have an established audit function and have performed such an audit of all activities in Items 1-6 within the past six months, this audit requirement is satisfied.)

Upon consultation with the NRC in September, 1979, we listed the one shipment of low-level radioactive waste we made which is covered by IE Bulletin No. 79-19

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(see attached letter). To comply with your latest request we have initiated a procedure to audit transport of low-level waste.

- (9) Report, in writing within 45 days, your plan of action and schedule with regard to the above items. In addition, provide responses to the three questions below. Reports should be submitted to the Director of the appropriate NRC Regional Office and a copy should be forwarded to the NRC Office of Inspection and Enforcement, Division of Fuel Facility, and Materials Safety Inspection, Washington, D.C. 20555.

Procedures for the above requested items are underway. Our letter of September 10, 1979 covers the question on our shipment of low-level radioactive waste. This has been the only shipment of low-level radioactive waste since 1978. No other shipments of low-level waste are planned for the near future.

Also attached is Mr. Uhl's letter of December 20, 1979 regarding an ammendment to our 12-00140-05 license. This was requested by Mr. Oberg.

Very truly yours,

ARCO PETROLEUM PRODUCTS COMPANY



M. P. Grosboll, Manager
Engineering Research

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Attachments