

ALLEGATION ACTION PLAN

AMS NO. RIII-00-A-0082

Licensee: Allied Signal (HONEYWELL)

Docket/License No: 040-03392

Assigned Division/Branch:

Allegation Review Board Membership:

Chairman - ~~G. Grant~~/ C. Pederson

Kaul
~~B. Paul / B. Berson / J. Heller / A. Kock~~

PHiland
PHiland, DNMS

~~B. Clayton / J. Grebe / S. Reynolds~~

GENERIC CONCERNS: If Yes Explain: _____

DISCUSSION OF SAFETY SIGNIFICANCE: _____

OI ACCEPTANCE: YES NO (Priority: HIGH NORMAL LOW)

Basis for OI Priority: _____

OI has Accepted Concern(s) No(s). _____ Signature _____

ARB MINUTES PROVIDED TO: Dyer/Paul/Hiland

ACKNOWLEDGMENT LETTER: PRINT IN FINAL _____ REVISE _____ N/A ☒

REFERRAL LETTER: A. Licensee YES _____ NO 1
B. State of YES ✓ NO _____
C. DOE YES _____ NO ✓

date received	04/14/2000		
due date of 1 st ARB	May 14, 2000	date -120 days old	August 12, 2000
due date of ACK Ltr	May 14, 2000	date -180 day old	October 11, 2000

COMMENTS:

THIS ALLEGATION IS ANONYMOUS

C. Pederson
Allegation Review Board Chairman

5/10/00
Date

B-11

(6)

SENSITIVE ALLEGATION MATERIAL

AMS No. RIII-00-A-0082

Each stated concern or NRC identified issue should be documented on a separate sheet. Each concern must be documented and written with enough detail to allow thorough follow up.

Concern No. 1 Employees and the general public are being overexposed to radiation. For example, there is groundwater contamination from sludge pond leaks.

Regulatory Basis: 10 CFR 20

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in ____ Days. (Describe the general areas we expect the licensee to address.)
- B. Priority RIII Follow up and Closure Memo to OAC
- C. Follow up During Routine Inspection Within ____ Days and Closure Memo to OAC
- D. Refer to OI. Recommended Priority: HIGH NORMAL LOW
Recommended Basis:
- XX E. Outside NRC's Jurisdiction. Describe Basis Below.
- F. Too General for Follow-up. Describe Basis Below.
- XX G. Other (specify) -

We are not aware of any groundwater contamination involving NRC licensed materials. In December 1999 we reviewed the licensee's ground water monitoring program and did not identify any adverse trends that would indicate that NRC licensed materials were contaminating the groundwater (Inspection Report 040-03392/99004(DNMS)). During our February 2000 inspection our inspector looked at each holding pond reviewed data collected, and discussed the licensee's pond closure plans with plant supervision. Pond "A" is a calcium fluoride holding pond that was originally built with a single liner and has been leaking calcium fluoride for over 10 years. According to the licensee small quantities of uranium (<600 parts per million (PPM)) have been found in the clay liner. Recently the U.S. Environmental Protection Agency (EPA) relinquished its jurisdiction over the chemical holding ponds to the Illinois EPA. Currently the Illinois EPA is working with the licensee to resolve this issue and oversee the pond closure. We recommend that this issue be referred to the Illinois EPA for followup.

Responsible for Action - EICS

II. Special Considerations/Instructions:

send to IL EPA

not necessary
Letter sent to
EPA was forwarded to
IL EPA according
to Linda's advice of
the EPA.
J. Kelly

~~SENSITIVE ALLEGATION MATERIAL~~

AMS No. RIII-00-A-0082

Each stated concern or NRC identified issue should be documented on a separate sheet. Each concern must be documented and written with enough detail to allow thorough follow up.

Concern No. 2 Employees and the general public are being overexposed to radiation. For example, there are unannounced and unreported hazardous releases of uranium hexafluoride and iodine pentafluoride into the atmosphere.

Regulatory Basis: 10 CFR 20

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in _____ Days. (Describe the general areas we expect the licensee to address.)
- B. Priority RIII Follow up and Closure Memo to OAC
- C. Follow up During Routine Inspection Within _____ Days and Closure Memo to OAC
- D. Refer to OI. Recommended Priority: HIGH NORMAL LOW
Recommended Basis:
- E. Outside NRC's Jurisdiction. Describe Basis Below.
- XX F. Too General for Follow-up. Describe Basis Below.
- XX G. Other (specify) -

✓ During 1999, Honeywell reported three events; however, two of the three events were not reportable events. In December 1999, we also reviewed a similar allegation that the licensee did not report a UF₆ release which was not substantiated (Inspection Report 040-03392/99004(DNMS)). In February 2000, the licensee also reported an iodine pentafluoride line rupture and again this event was not required to be reported to the NRC. Therefore, we have no reason to believe that the licensee has had unreported releases of hazardous materials to the atmosphere. In addition, the allegation is vague and non-specific. We recommend this concern be closed.

Responsible for Action - _____ EICS

II. Special Considerations/Instructions:

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Each stated concern or NRC identified issue should be documented on a separate sheet. Each concern must be documented and written with enough detail to allow thorough follow up.

Concern No. 3 Employees and the general public are being overexposed to radiation. For example, there are inaccurate and false reporting of biological sampling of workers.

Regulatory Basis: 10 CFR 20

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in _____ Days. (Describe the general areas we expect the licensee to address.)
- B. Priority RIII Follow up and Closure Memo to OAC
- C. Follow up During Routine Inspection Within _____ Days and Closure Memo to OAC
- D. Refer to OI. Recommended Priority: HIGH NORMAL LOW
Recommended Basis:
- E. Outside NRC's Jurisdiction. Describe Basis Below.
- XX F. Too General for Follow-up. Describe Basis Below.
- XX G. Other (specify) -

Bioassay records are routinely reviewed during our health physics inspections. Prior to March 2000, all weekly and monthly urine bioassay results were conservatively calculated using an administrative minimum detectable limit (MDL) of 2 mg/ml (2.0 PPB (parts per billion)) which equates to a calculated dose of 308 mrem (Internal dose). The licensee was concerned that this calculated dose appeared higher than other licensees doing similar activities and discussed this issue with other licensee's doing similar work with natural uranium and UF₆ and concluded that their assigned dose (308 mrem) was an over estimate and should be reduced to approximately half that amount (154 mrem). Therefore, all bioassay results prior to March 2000, were overestimates of internal exposure. If this is what the CI is referring to, we do not consider the overestimated bioassay results "inaccurate and/or false biological sampling." We are scheduled to conduct a routine inspection at the licensee's facility in June 2000. During that routine inspection, a review of the biological sampling program and the resultant dose estimate will be performed. Any discrepancies noted will be documented in the Inspector's report. Based on the concern being vague and non-specific, we recommend the concern be closed.

Responsible for Action - EICS

II. Special Considerations/Instructions:

~~SENSITIVE ALLEGATION MATERIAL~~

AMS No. RIII-00-A-0082

Each stated concern or NRC identified issue should be documented on a separate sheet. Each concern must be documented and written with enough detail to allow thorough follow up.

Concern No. 4 Employees and the general public are being overexposed to radiation. For example, radioactive drums and pallets are compiled throughout the plant-and also buried underground..

Regulatory Basis: 10 CFR 20

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in ____ Days. (Describe the general areas we expect the licensee to address.)
- B. Priority RIII Follow up and Closure Memo to OAC
- C. Follow up During Routine Inspection Within ____ Days and Closure Memo to OAC
- D. Refer to OI. Recommended Priority: HIGH NORMAL LOW
Recommended Basis:
- E. Outside NRC's Jurisdiction. Describe Basis Below.
- F. Too General for Follow-up. Describe Basis Below.
- G. Other (specify) -

XX/
✓

During our last inspection in February 2000, we confirmed that the licensee is collecting and compiling wood pallets and metal drums for the purpose of waste disposal. Our inspector observed the truck loading of wood chips from pallets and transfer of those chips to a waste broker for disposal. Our Inspector also discussed with the licensee their plans to dispose of their excess empty barrels. The licensee is also aware of rumors that Allied-Signal may have buried contaminated barrels somewhere on their 800 acre site years ago (1950's), however, according to the health physics group, they have never been able to substantiate this rumor. We recommend that this issue be closed unless additional information becomes available to assist our staff in the resolution of this concern.

Responsible for Action - EICS

II. Special Considerations/Instructions:

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AMS No. RIII-00-A-0082

Each stated concern or NRC identified issue should be documented on a separate sheet. Each concern must be documented and written with enough detail to allow thorough follow up.

Concern No. 5 Employees and the general public are being overexposed to toxic chemicals.

Regulatory Basis: NONE

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in _____ Days. (Describe the general areas we expect the licensee to address.)
- B. Priority RIII Follow up and Closure Memo to OAC
- C. Follow up During Routine Inspection Within _____ Days and Closure Memo to OAC
- D. Refer to OI. Recommended Priority: HIGH NORMAL LOW

Recommended Basis:

- XX E. Outside NRC's Jurisdiction. Describe Basis Below.
- F. Too General for Follow-up. Describe Basis Below.
- G. Other (specify) -

Refer to EPA.

Responsible for Action - EICS

II. Special Considerations/Instructions:

*from the CT
include LTR. in the referral to EPA.*

~~SENSITIVE ALLEGATION MATERIAL~~

May 5, 2000

MEMORANDUM TO: Brent Clayton, Enforcement/Investigations Officer, EICS
FROM: Cynthia D. Pederson, Director, DNMS /s/ C. D. Pederson
SUBJECT: REVIEW OF DOCUMENT FROM ANONYMOUS
CONCERNED INDIVIDUAL, ALLEGATION
NO. RIII-2000-A-0082 (HONEYWELL) (AITS M00-4148)

In response to your request dated April 14, 2000, division staff have completed their review of a letter from an anonymous concerned individual (CI) regarding activities at Honeywell Speciality Chemicals (formerly known as Allied-Signal) in Metropolis, Illinois. The CI indicated that he/she was concerned about recent media articles in the local Metropolis, Illinois area.

Our conclusions regarding the CI's specific concerns indicated that the concerns are somewhat general and vague, however, the general areas of the CI's concerns are routinely reviewed during our routine inspection program, e.g., airborne releases of UF₆, worker bioassay results and radioactive waste issues. Our review and conclusion to each of the four concerns are as follows:

Groundwater contamination from sludge pond leaks

We are not aware of any groundwater contamination involving NRC licensed materials. In December 1999 we reviewed the licensee's ground water monitoring program and did not identify any adverse trends that would indicate that NRC licensed materials were contaminating the groundwater (Inspection Report 040-03392/99004(DNMS)). During our February 2000 inspection our inspector looked at each holding pond reviewed data collected, and discussed the licensee's pond closure plans with plant supervision. Pond "A" is a calcium fluoride holding pond that was originally built with a single liner and has been leaking calcium fluoride for over 10 years. According to the licensee small quantities of uranium (<600 parts per million (PPM)) have been found in the clay liner. Recently the U.S. Environmental Protection Agency (EPA) relinquished its jurisdiction over the chemical holding ponds to the Illinois EPA. Currently the Illinois EPA is working with the licensee to resolve this issue and oversee the pond closure. We recommend that this issue be referred to the Illinois EPA for followup.

Unannounced and Unreported releases (UF₆ and iodine pentafluoride)

During 1999, Honeywell reported three events; however, two of the three events were not reportable events. In December 1999, we also reviewed a similar allegation that the licensee did not report a UF₆ release which was not substantiated (Inspection Report 040-03392/99004(DNMS)). In February 2000, the licensee also reported an iodine pentafluoride line rupture and again this event was not required to be reported to the NRC. Therefore, we have no reason to believe that the licensee has had unreported releases of

B. Clayton

SENSITIVE ALLEGATION MATERIAL

hazardous materials to the atmosphere. In addition, the allegation is vague and non-specific. We recommend this concern be closed.

Inaccurate and false biological sampling of workers

Bioassay records are routinely reviewed during our health physics inspections. Prior to March 2000, all weekly and monthly urine bioassay results were conservatively calculated using an administrative minimum detectable limit (MDL) of 2 mg/ml (2.0 PPB (parts per billion)) which equates to a calculated dose of 308 mrem (internal dose). The licensee was concerned that this calculated dose appeared higher than other licensees doing similar activities and discussed this issue with other licensee's doing similar work with natural uranium and UF₆ and concluded that their assigned dose (308 mrem) was an over estimate and should be reduced to approximately half that amount (154 mrem). Therefore, all bioassay results prior to March 2000, were overestimates of internal exposure. If this is what the CI is referring to, we do not consider the overestimated bioassay results "inaccurate and/or false biological sampling." We are scheduled to conduct a routine inspection at the licensee's facility in June 2000. During that routine inspection, a review of the biological sampling program and the resultant dose estimate will be performed. Any discrepancies noted will be documented in the inspector's report. Based on the concern being vague and non-specific, we recommend the concern be closed.

Radioactive drums and pallets being compiled- and buried underground

During our last inspection in February 2000, we confirmed that the licensee is collecting and compiling wood pallets and metal drums for the purpose of waste disposal. Our inspector observed the truck loading of wood chips from pallets and transfer of those chips to a waste broker for disposal. Our inspector also discussed with the licensee their plans to dispose of their excess empty barrels. The licensee is also aware of rumors that Allied-Signal may have buried contaminated barrels somewhere on their 800 acre site years ago (1950's), however, according to the health physics group, they have never been able to substantiate this rumor. We recommend that this issue be closed unless additional information becomes available to assist our staff in the resolution of this concern.

We will be prepared to discuss this matter at the next scheduled Allegation Review Board.

CONTACT: D. Wiedeman, DNMS
(630) 829-9808

DOCUMENT NAME: G:\SEC\M00-4148.WPD

*SEE PREVIOUS CONCURRENCE

To receive a copy of this document, indicate in the box: "C" = Copy without enclosure "E" = Copy with enclosure "N" = No copy

OFFICE	RIII	c	RIII	n	RIII	n	RIII	
NAME	Wiedeman:ib		Phillips		Hiland		Pederson	
DATE	04/24/00		04/25/00		04/25/00		05/04/00	

OFFICIAL RECORD COPY

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NEW ALLEGATION: RIII-00-A-0082

May 8, 2000

MEMORANDUM TO: Patrick Hiland, Chief, Fuel Cycle Branch, DNMS

FROM: J. Heller/ A. Kock, RIII - OAC

SUBJECT: RECEIPT OF NEW ALLEGATION: RIII-00-A-0082 (ALLIED SIGNAL (HONEYWELL))

On April 14, 2000, EICS received concerns regarding Allied Signal (Honeywell) .

On May 5, 2000, Patrick Hiland ,Branch Chief, reviewed the concerns with OAC and agrees:

- all of the concerns were identified,
- all of the concerns were correctly characterized,
- the regulatory basis for each concern was correctly identified, and
- with the proposed action to resolve each concern,
-

I have scheduled an Allegation Review Board (ARB) for May 10, 2000 . Please review the attached information to prepare for the ARB.

cc w/attachments:

ARB Copy

OI

RC