

# Shieldalloy Corporation

DIVISION OF METALLURG. INC.  
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SHIDALLOY NEFD

CABLE REGISTRATION  
SHIELDALLOY

July 17, 1985

Mr. John D. Kinneman, Chief  
Nuclear Materials Safety Section A  
Division of Radiation Safety and  
Safeguard  
U. S. Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Re: License No. SMB-743  
Inspection No. 040-07102/85-01  
Docket No. 040-07102

Dear Mr. Kinneman:

We are in receipt of your letter dated June 21, 1980 regarding a site inspection of our facility on April 2, 1985. This letter will address the violations cited and the corrective measures that we have taken in each case. Each of the violations will be addressed separately.

1. In regards to the air sampling requirement in the furnace area and the blending area, we have taken samples during the week of May 28. We are maintaining a two month schedule tied into our ferrocolumbium production. During 1981 and 1982, we experienced a large turndown of our production as we were operating three days per week. The sampling schedule had not been revised as our production level had picked up again.

The past results we have achieved through our film badge program show that the average whole body exposure to beta radiation was negligible. Considering the low level of radiation that we have, wouldn't we be in compliance with Section 20.201(b) if we performed our air sampling on a bi-annual basis? I would appreciate your comments regarding this.

2. Gamma surveys were taken May 28, 1985 at the scale and furnace in Department 111, in the warehouse and the slag pile. We have included gamma surveys to be done on a quarterly basis in conjunction with our monthly plant safety tour to insure compliance.

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# Shieldalloy Corporation

Mr. John D. Kinneman  
Page two  
July 17, 1985

3. The survey meter has been calibrated by Applied Health Physics. Presently, the survey meter is required to be calibrated every seven months. I request that this period be extended to 12 months.
4. We have requested that our suppliers of pyrochlore send an analysis showing percentages of thorium and uranium by the second week of each quarter. To verify these analyses, we are going to take a random sample biannually and have our lab perform an analysis.
5. Our air sampler is now being calibrated prior to each usage. We feel that this will insure the accuracy of our data.
6. At the time of our inspection, I told John McFadden that our first priority was to update records of instruction to our employees. Through our Personnel Office, we sent out radioactivity statements to all employees that we did not have a signed copy on file. We reviewed this with each supervisor to explain its statement to their men.

The situation has arose in the past where employees would transfer jobs to a department handling radioactive material. We feel that our employees should know the conditions prior to a transfer.

Any new employees are going to be instructed of our Radiation Safety Program prior to starting work. They will also be given a radioactivity statement to sign. The radioactivity statements will be kept on file in the Personnel Office.

In regards to our waste or slag piles, I don't understand your concern of an uncovered pile exposed to the weather. The slag is totally insoluble and in a rock form of about one foot in diameter. We have a specific area on site where the ferrocolumbium slag is stored. The slag is only transported to the area. Nothing is transported from the area.

Through our licensing procedure in 1980, there was correspondence with the NRC regarding the issue of disposal of slag. The issue was resolved to leave the slag on site. There are no disposal facilities for this low level waste in our area. We have asked the NRC to give us direction in this matter, but have not received any guidance. I ask for your suggestions in this matter. Currently, our production rate yields approximately 1,000 tons of slag annually.

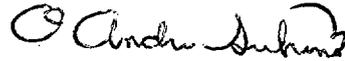
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Mr. John D. Kinneman  
Page three  
July 17, 1985

Hopefully, this satisfies the requirements of 10CFR2.201. If you require further information, please contact the undersigned.

Very truly yours,

SHIELDALLOY CORPORATION



O. Andrew Simkins  
Asst. Plant Engineer

OAS/ljb