UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 15, 1995

40-7102

Mr. C. Scott Eves
Vice President, Environmental Services
Shieldalloy Metallurgical Corporation
12 West Boulevard
P.O. Box 768
Newfield, New Jersey 08344

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR SAFETY EVALUATION REPORT FOR LICENSE RENEWAL APPLICATION (TAC NO. L21474)

Dear Mr. Eves:

This refers to your revised application dated June 2, 1992, requesting renewal of Materials License SMB-743 for your Newfield, New Jersey, facility. Our review of your application has identified additional information that is needed before final action can be taken on your request. The additional information is specified in the enclosure. References to proposed license conditions and application page numbers are to your application dated June 2, 1992, as revised February 10, 1993. Please reference the above TAC NO. in future correspondence related to this request.

As part of your response, you should provide information that reflects your current operations. It is also important to note that commitments made in your application will become license conditions through incorporation by reference into your license. Specific information (such as individual names, individual experiences, etc.) should not be included in the Conditions Section of your application but could be included in a demonstrations section which is not incorporated into the license. Such a revision will reduce the number of future amendments to address personnel changes or other specific information which may often change.

Please submit your responses to the enclosed report, with page changes for your application (or a revision in its entirety) by August 1, 1995. If any of the information requested has been provided in previous submittals, please reference the submittal and cite the location of the information in the submittal.

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In recent requests to SMC for additional information, SMC's responses to NRC have consistently been both incomplete and tardy. This practice reflects poorly on SMC's commitment to safety and protection of the public and the environment and should not continue. If an unavoidable delay is necessary to respond to this request for additional information, you should advise me, in writing, of the delay with an explanation well in advance of the desired August 1, 1995, due date. If you have any questions or would like to schedule a meeting to discuss the enclosed comments, please call me at (301) 415-8106.

Sincerely,

Original signed by:

Gary C. Comfort, Jr.
Licensing Section 2
Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Docket 40-7102
License SMB-743

Enclosure: Safety Evaluation Report
Additional Information Request

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DATE	6/15/95		6/15/95		6/15/95			

Request for Additional Information
Application dated June 2, 1992
Shieldalloy Metallurgical Corporation
Docket 40-7102

Please provide the following information:

RSO's Authority to Stop Work (pg. 21)

1. Provide a copy of the procedure(s) stating when and how the Radiation Safety Officer (RSO) is permitted to use a stop-work order.

2. Are there any designees that also have the RSO's authority to stop work if the RSO is not available?

Monitoring

1. Provide a detailed description of all of your radiological monitoring programs. Include frequencies, types of data recorded, etc., in your response. Copies of procedures may be used to supplement the response.

Airborne (Proposed Condition 5)

2. Provide the latest quarterly results of airborne monitoring that will be retained as a record.

Ambient External (Proposed Condition 8)

3. The proposed condition states that ambient external monitoring will be conducted quarterly, and page 30 states that the deployment of the area monitors will be at the discretion of the RSO. Since the results of this program may be used (as proposed by the application) for assignment of external doses in place of personnel dosimeters, what procedures are used by the RSO to ensure that placement of the monitors adequately models personnel exposures?

4. What are the highest quarterly area dosimeter results to date? At what location was this measurement detected?

5. What actions are to be taken if abnormally high results are detected by the dosimeter? What level of exposure results in these actions?

Off-site Exposure (Proposed Condition 9)

6. Without an on-line monitoring system at the stacks, what information/data is used to evaluate the dose to the maximally exposed off-site individual? Who has responsibility for this calculation?

Internal Monitoring

7. What is the frequency for random internal personnel surveys, as discussed on page 29 of the application?

8. Which internal radiation monitoring method (e.g., urinalysis, whole-body detector, etc.) will be used for the types and quantities of radioactive material used by the employees?

Radiation Safety Committee (RSC) (Proposed Condition 4)

1. What are the RSC membership requirements (e.g., experience, training, etc.)?

2. Other than annual meetings to establish ALARA goals, how and when is it determined necessary for the RSC to meet to review procedural changes, etc.?

3. How many RSC members form a quorum?

4. Submit an update of your RSC membership by job title (e.g., RSO, Vice President of..., etc.).

5. During its meetings, does the RSC analyze monitoring data to determine trends in exposures or effluents as part of its ALARA review? Identify the senior management to which the RSC reports its findings.

Contamination Surveys (Proposed Condition 6)

1. The definition of "Restricted Area" in your application (page 15) refers to areas with limited access for purposes of controlling radioactive material exposures to individuals. Therefore, the term "Unrestricted Area" seems to refer to areas other than restricted within the controlled area. Is this a correct interpretation?

2. Based on the interpretation of unrestricted area above, what portion of the unrestricted area is surveyed for contamination? How are survey locations determined?

3. For fixed and removable ("loose") contamination limits presented on pages 34-35 of your application, are these limits total disintegrations from all sources of radiation (e.g., alpha, beta, and gamma sources)?

Organization

1. Update your radiation safety organization, including the use of Health Physics consultants, as appropriate. For each position, list the educational, experience, and training requirements and provide a short summary of duties and responsibilities.

2. Currently, Mr. H. Nils Schooley, President of SMC, is responsible for the overall control and authority for radiological protection. In the

future, is this responsibility defined by position or by individual?

3. Rather than listing specific individuals in your license, we recommend license conditions that authorize the Radiation Safety Officer to approve an individual who has completed the authorized users and the radiation workers training programs and has met any other conditions (if any) as defined by the position's requirements. Please indicate if such a condition is acceptable.

4. Describe how your radiation protection personnel interact, in a timely manner, with production personnel to ensure that methods and techniques for reducing occupational radiation exposure are incorporated in facility operations.

5. Describe what health physics personnel (as per proposed condition 7) are available to SMC. Include position requirements, responsibilities, and their reporting chain in question 1 of this section. Does the RSO and assistant RSO meet the requirements of health physics personnel as stated in the definition on page 13?

6. What methods of interaction are employees given to notify management of unsafe conditions at the facility? Is there a method for tracking such comments and recording their disposition?

Procedural Changes

1. How is the review of procedural changes documented (from initiation to RSC review to employee training)?

2. How soon after (or before) implementation of new procedures are employees notified of their existence and trained in their use?

Material Control

1. Is an inventory log available which tracks licensed material in the slag storage yard for slag and dust pile accumulation as separate inventories? If so, how often is it updated?

2. Submit updated inventories of radioactive material accumulation, preferably for each individual storage pile. If possible, these inventories should include pile volumes, pile weights, and weights of radioactive isotopes for each licensed isotope.

Quality Assurance

1. What is the makeup of personnel/contractors in the SMC Quality Assurance Group discussed on page 54 of the application?

2. What types of audits are expected to be performed as envisioned by proposed condition 10?

Ventilation Systems

1. Are there any minimum operating requirements of the ventilation system (e.g., flow velocities, differential pressure across filters, etc.) under which operations would be required to be ceased or postponed?

Fire Protection

1. What sources of ignition and combustibles are available in restricted areas?

2. Submit an evaluation of combustion and release of pyrochlore to both the public and workers. Include statements of all assumptions. If release of such material is unlikely through fire dispersion, please explain why.

3. What type of fire suppression equipment is available? What employee training is provided for this equipment?

4. If off-site fire crews are expected to participate in fire suppression, is any training or notification of hazards provided to these personnel? Is there any written correspondence with such emergency crews (e.g., response pacts)?