



SHIELDALLOY METALLURGICAL CORPORATION

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DAVID R. SMITH
Environmental Manager
NEWFIELD OPERATIONS

WEST BOULEVARD
P.O. BOX 768
NEWFIELD, NJ 08344
TELEPHONE (609) 692-4200
TWX (510) 687-8918
FAX (609) 692-4017

March 6, 1998

Mr. Michael Weber
Chief, Licensing Branch
Division of Fuel Cycle Safety and Safeguards, NMSS
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Bioassay Program for Source Material License No. SMB-743 (TAC No. L30921)

Dear Mr. Weber:

Shieldalloy Metallurgical Corporation (SMC) is in receipt of a January 28, 1998 letter regarding the referenced matter from Ms. Heather Astwood (USNRC Licensing Section 2). Ms. Astwood's letter refers to a (draft) Radiation Safety Procedure No. RSP-010, "Exposure Control", wherein it states that monitoring methods for internal exposures at the Newfield facility may include indirect bioassay monitoring (urine bioassay), breathing zone sampling (monitoring the concentration of radioactivity in the breathing zone of the workers), or a combination of indirect bioassay and breathing zone sampling. USNRC's letter required additional information (as specified in Part II of the enclosure to USNRC's letter) to be provided in order to demonstrate compliance with 10 CFR Part 20. SMC has been using air monitoring data (personnel breathing zone area-BZA) to ensure compliance and will continue to use this method of data collection, evaluation and assessment to ensure compliance with 10 CFR Part 20 Occupational Dose Limits.

SMC takes exception to a number of the items for which the USNRC is requiring additional commitments before the procedure (of monitoring and evaluating occupational dose exposures using indirect bioassay monitoring) will be approved for implementation. SMC, however, does not wish to delay USNRC's action on our November 25, 1997 application to amend the referenced license in its entirety while awaiting resolution of indirect bioassay issue. Therefore it is requested that this issue be placed "on hold" until after Amendment 1 has been issued. SMC intends to address those items in Ms Astwood's January 28, 1998 letter at a later date but in the meantime will continue to use breathing zone sampling as the primary means of meeting the exposure control commitments in our Radiation Protection Program Plan. However, we may supplement these efforts with indirect bioassay measurements.

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Mr. Michael Weber
U. S. Nuclear Regulatory Commission
Page Two

If you have any questions or if I can provide you with additional information, please do not hesitate to contact me at (609) 692-4200 ext 226.

Sincerely,

A handwritten signature in black ink that reads "David R. Smith". The signature is written in a cursive style with a large initial "D" and "S".

David R. Smith
Radiation Safety Officer

cc:

Nigel C. Morrison
Mary B. Higgins
James P. Valenti
Radiation Safety Committee; member of
Carol D. Berger - IEM
Heather Astwood - USNRC Licensing Section 2
Penny Lanzisera - USNRC Region 1