

MAY 3 1976

✓ General Electric Company
Attention: Mr. T. P. Handley
Acting Manager, Relations,
Manpower & Organizational
Planning
Valley Forge Space Center
P. O. Box 8555
Philadelphia, Pennsylvania 19101

License Nos. 37-02006-05
SNM-1199
SMB-1005
Inspection No. 76-01

Reference: Your letter dated April 23, 1976
In response to our letter dated April 6, 1976

Gentlemen:

Thank you for informing us of the corrective and preventive actions you documented in response to our correspondence. These actions and the new information that you supplied will be examined during a subsequent inspection of your licensed program.

With respect to your statement concerning the degree of hazard, we concur with your statement that the new information that you supplied reduces the level of severity to that of a deficiency. The records concerning this matter have been changed accordingly.

Your cooperation with us is appreciated.

Sincerely,

Paul R. Nelson, Chief
Fuel Facility and Materials
Safety Branch

bcc:
IE Mail & Files (For Appropriate Distribution)
PDR
Local PDR
NSIC
REG:I Reading Room
State of Pennsylvania

McClintock
McClintock/jb
4/29/76

Nelson
Nelson
4/29/76

O'Reilly
O'Reilly
5/2

D-21



SPACE DIVISION

GENERAL ELECTRIC COMPANY VALLEY FORGE SPACE CENTER
(MAIL: P. O. BOX 8555, PHILADELPHIA, PENNSYLVANIA 19101), Phone (215) 962-2000

April 23, 1976

U.S. Nuclear Regulatory Commission
Region II
631 Park Avenue
King of Prussia, PA 19406

Att: Mr. Paul R. Nelson, Chief
Fuel Facility and Materials
Safety Bunch

Dear Mr. Nelson:

This letter replies to your notice of violation dated April 6, 1976, as required by 10CFR2.201.

The following three items are offered in explanation of the alleged violation:

1. At the time of the inspection on March 29, 1976, the individual assigned to perform the leak tests was unavailable. In subsequent questioning, the existence of a leak test reminder chart was uncovered. This chart shows that the leak tests were performed in October 1975. This places the Sr 90 test late by approximately two months and the Co 60 test late by approximately one month.
2. Although this occurrence appears to be of a recurrent nature, the cause behind the earlier violation in 1973 is somewhat different from the cause behind the current alleged violation. In 1973, the Health Physicist was in the midst of attempting to upgrade the records systems he had inherited. In addition, a period of four months had elapsed when a full-time Health Physicist was unavailable. Following the 1973 inspection, these record systems were completed and operated with only a few minor errors of omission until mid-1975.

In 1975, the health physics component was required to provide services to an ERDA contract on an unforeseen and demanding schedule until October 1975. The time demands of this schedule caused gross interference with the license compliance effort. Nevertheless, compliance during this period was, for the most part, maintained.

P. R. Nelson
Page Two
April 23, 1976

3. During the one to two month lapse period, the sources were in the radioactive materials storage vault. Access to this vault is restricted to health physics personnel. Any source leakage which might have occurred would have been confined to the source containers. Any threat to the public would have been remote.

Corrective actions were taken prior to the inspection of March 29, 1976 as follows:

1. During mid-1975, it was recognized that the projected work load to the health physics component would interfere with license compliance. An effort was begun to obtain a third permanent member of the component. In November 1975 a third person was obtained.
2. Concurrently, attempts were made to obtain temporary assistance. In October 1975, help was received from the Division component in Ohio.
3. During late 1975 and early 1976, all sources were inventoried and evaluated to determine their continued usefulness. The primary purpose of this evaluation was to reduce the amount of time required to maintain the inventory and accomplish leak tests. Approximately 70% of the total number of sources were disposed to radioactive waste.

Following the inspection, two more corrective actions were taken:

1. A reminder chart for the leak tests has been prominently posted in the health physics office.
2. The assignment of leak testing to a single individual has been removed. Each person in the component is now required to check the reminder chart on a routine basis and perform leak tests when scheduled.

In summary, we have determined that the referenced leak tests were late by a maximum of two months. Deficiencies in these areas were due to unforeseen work load requirements. Also, the Division had taken steps prior to the inspection to reduce potential errors in license compliance. In light of the foregoing and the remoteness of the hazard to the public, we believe that the level of non-compliance should be reduced from "infraction" to "deficiency".

The Division is now in full compliance with regard to the items mentioned in your "Notice of Violation" dated April 6, 1976.

Sincerely,



T. P. Handley, Acting Manager
Relations, Manpower & Organizational Planning

cc: RG Oesterling