

JUN 1 1973

Nuclear Metals, Inc.
Attention: Mr. W. B. Tuffin
President
2229 Main Street
Concord, Massachusetts 01781

Docket No. 70-82

Reference: Your letter dated May 23, 1973 in response
To our letter dated April 30, 1973

Gentlemen:

Thank you for your letter informing us of the action you have taken to correct the violations which we brought to your attention following our recent inspection of your licensed program. Your corrective action will be verified during our next inspection of your program.

In accordance with Section 2.790 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the AEC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Your cooperation with us is appreciated.

Sincerely,

James P. O'Reilly
Director

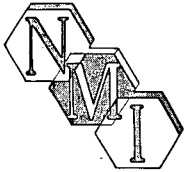
Enclosure:

RO Inspection Report No. 70-82/73-02
bcc: Chief, Field Support & Enforcement Branch, RO
RO:HQ (4)
L:D/D for Fuels & Materials
DR Central Files

OFFICE ▶	PDR		RO			
SURNAME ▶	NSIC	State of Mass.	Kinney:smg	Crocker-Carlson-Nelson-O'Reilly		
DATE ▶			5/31/73	6/1/73	6/1/73	92

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NUCLEAR METALS, INC.

2229 Main Street
Concord, Massachusetts-01742
Telephone (617) 369-5410

May 23, 1973

United States Atomic Energy Commission
Directorate of Regulatory Operations
Region I
970 Broad Street
Newark, New Jersey 07102

Attention: Mr. James P. O'Reilly, Director

Reference: DOCKET NO. 70-82
AEC LICENSE NO. SNM-65
YOUR LETTER RECEIVED MAY 3, 1973

Gentlemen:

This letter is in response to those items specified in your letter of April 30, 1973 which appeared to be in violation of AEC requirements.

1. 10 CFR 20.205: "Procedures for Opening Packages"

CORRECTIVE ACTION: Written and approved (by Nuclear Metals personnel) procedures for opening packages in which licensed material is received and for closing packages in which licensed material is transported have been generated, a copy is attached.

TO AVOID FUTURE VIOLATIONS: This procedure has been followed successfully for two shipments and two receipts since its implementation on April 4, 1973. All personnel involved in receipts and shipments have been advised of these procedures by memo copy.

DATE OF COMPLIANCE: April 4, 1973.

2. License Condition 8, Application Sections II(a)2. and IV(a)v.: "Placement of Exclusion Area Boundaries"

CORRECTIVE ACTION: The boundaries of the specific exclusion area referred to in your letter of April 30 were enlarged on April 5, 1973 to prevent storage of SNM closer than three feet to the boundary.

TO AVOID FUTURE VIOLATIONS: A part of their daily inspections of work areas, the Criticality Officer and the Nuclear Control Monitor examine exclusion areas for boundary placement and effect any adjustments as may be needed.

DATE OF COMPLIANCE: April 5, 1973.

3. License Condition 8, Application Section II(a)6.: "Fire Extinguisher Inspection"

CORRECTIVE ACTION: A detailed examination of our records for fire extinguisher inspection, repair and refilling, performed after the inspection conducted by Mr. Kinney on April 5, reveals that the two fire extinguishers noted by Mr. Kinney as not carrying evidence of inspection during October, 1972 on attached tags were, in fact, sent out of the building during that time period for maintenance and refilling. By oversight, the attached tags were not so marked on return of these extinguishers.

TO AVOID FUTURE VIOLATIONS: Members of the Concord Fire Department, who perform such inspection, refilling, and maintenance have since been instructed to assure that the attached tags as well as the log of records properly reflect actions taken relative to individual fire extinguishers. The Safety Engineer also conducts periodic audits of records to assure proper recording.

DATE OF COMPLIANCE: May 21, 1973.

4. License Condition 8, Application Section II(a)11: "Guard Force"

CORRECTIVE ACTION: Our Safety Engineer is on duty during the Monday through Friday day shift. He is also the Supervisor of our Guard Force and is a special police officer of the Town of Concord. As such, he is responsible for industrial security.

The employees' entrance near the central guard station is either manned or locked at all times during the day shift. The main lobby entrance is continually manned by our receptionist, and the Shipping and Receiving entrance is also manned during the day shift.

All alarm systems are tied-in with the public address system by a brass ring clamped around the microphone. This makes all alarms clearly audible throughout the facility.

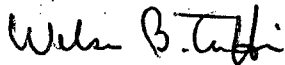
United States Atomic Energy Commission
Directorate of Regulatory Operations
Attn: Mr. James P. O'Reilly, Director
May 23, 1973

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TO AVOID FUTURE VIOLATIONS: See above.

DATE OF COMPLIANCE: May 23, 1973.

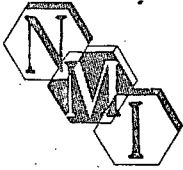
Very truly yours,



Wilson B. Tuffin
President

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Attachment



NUCLEAR METALS, INC.

TO : R. C. Franks/P. J. Zagarella

DATE: 4/4/73

FROM : A. R. Gilman

SUBJECT: RECEIVING AND SHIPPING PROCEDURES FOR ENRICHED URANIUM

Effective immediately, the following procedures are to be followed on receiving or shipping of enriched uranium.

A. Receipt of Enriched Uranium

1. Shipping and Receiving shall be alerted to the expectation of receipt of enriched uranium by P. J. Zagarella on his receipt of AEC Form 741.
2. On receipt of packages understood to contain enriched uranium, Shipping and Receiving shall immediately notify P. J. Zagarella, R. C. Franks, and A. R. Gilman. These individuals shall proceed to inspect and accept the shipment as defined below.
3. A visual inspection shall be performed for damaged packages, as the package stands on the loading dock. On the finding of damage, particular attention to radiation leakage, shall be observed during the remainder of receiving procedures.
4. The exterior surface of each package shall receive a wipe test for external contamination, prior to any movement of packages. Surface contamination shall be evaluated by alpha, beta, and gamma survey of each wipe, and shall not exceed those limits established in 49 CFR 173.397.
5. The packages that meet the visual inspection and surface contamination criteria defined above, may be moved to Butler No. 1 to facilitate opening and unpacking.
6. Contaminated packages shall be decontaminated at the location where they are found to be contaminated, to avoid further spread of contamination. Decontamination methods shall be at the election of A. R. Gilman/ R. C. Franks/P. J. Zagarella and shall be responsive to the particular situation encountered. Assistance may also be requested from AEC-Newark and/or our consultants as required.

Memo to: R. C. Franks/P. J. Zagarella
Subject: RECEIVING AND SHIPPING PROCEDURES FOR ENRICHED URANIUM
Date : 4/4/73

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AEC-Newark shall be notified of receipt of all packages evidencing removable contamination in excess of limits specified in 4. above.

7. Damaged packages shall be opened at the location where they are found, and contents checked for escape of contamination, any significant geometry alteration, and for water flooding. Wet packages shall be allowed to dry before further processing. If the contents are undamaged, contents shall be transferred into storage racks per guidelines established by Lincoln Clark, Jr., our consulting nuclear physicist.
8. The organization effecting shipment to Nuclear Metals shall be notified of receipt of all packages via returned copy of AEC Form 741 and receipt of damaged or contaminated packages shall be noted and described on this form.
9. All actions relative to receipt of damaged or contaminated packages shall be documented in a log maintained by A. R. Gilman.

B. Shipment of Enriched Uranium

1. Quantities to be placed in individual shipping containers shall be as specified in license SNM-65.
2. The only shipping container approved for use for most shipments of enriched uranium from Nuclear Metals is our standard five inch schedule 40 pipe with wheel-like end-caps (CAVCO Model A) contained in an ICC 17H single trip 55-gallon drum. This container is defined as Model 2823, and carries Department of Transportation authorization for use under Special Permit No. 4969. Quantities less than 15 grams contained U-235 may be shipped per 49 CFR 173.
3. Prior to each use of a given container, the inner and outer containers shall be inspected for proper marking and for condition by P. J. Zagarella. The cover of inner containers must screw down tightly. Inner containers must not show evidence of damage, resulting in structural weakening. Outer containers must be intact, without holes, gaskets on covers must be in good condition, and cover closures must be capable of providing a water tight seal.

Memo to: R. C. Franks/P. J. Zagarella
Subject: RECEIVING AND SHIPPING PROCEDURES FOR ENRICHED URANIUM
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4. At time of packaging, containers must be shown to be free of removable contamination by wipe test both before and after loading to limits specified in 49 CFR 173.393 and .397. Wipe testing shall be performed by R. C. Franks, results shall be kept in a log book, and a copy shall be forwarded to the recipient of the shipment.
5. Loaded containers shall be sealed by P. J. Zagarella, finished loaded containers comprising a shipment shall be visually inspected by R. C. Franks and A. R. Gilman for proper sealing and marking, R. C. Franks shall fill in radiation labels as required.
6. Shipment of liquids is not authorized under any circumstances.

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