



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

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OCT 24 1979

Docket No. 70-687

Union Carbide Corporation  
ATTN: Mr. James J. McGovern  
Production Manager, Radiochemicals  
P. O. Box 324  
Tuxedo, New York 10987

Gentlemen:

Subject: Inspection 70-687/79-03

This refers to your letter dated September 24, 1979, in response to our letter dated August 30, 1979.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a subsequent inspection of your licensed program.

With regard to your reply to item F, existing regulations in 10 CFR 20, require you to label the storage cabinet.

Webster defines a container as "one that contains; esp: a receptacle..." Receptacle is defined as "one that receives and contains something". Your cabinet had received and contained, at the time of this inspection, approximately 200 microcuries of Uranium-235, an amount in excess of the quantities exempted by Appendix C of 10 CFR 20.

We also note that at the time of the inspection, there were three yellow storage cabinets located in the plating area of the Hot Lab Building. Two of the three cabinets were posted as follows:

"Caution-Radioactive Material"

In addition you state, "labeling is not required for containers which are accessible only to individuals authorized to handle or use them, or to work in the vicinity thereof, provided that the contents are identified to such individuals by a readily available written record". The cabinets in the plating areas are accessible not only to individuals authorized to handle or use them, or to work in the vicinity. Everyone who has access to the Hot Lab Building has access to the cabinets because there are no barriers or restraining devices to prevent access.

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You imply that your records indicating the contents of the storage cabinet were readily available. At the time of this inspection your log book, identifying the contents of the cabinet, was locked in your custodians desk drawer, in his office on the first floor of the Hot Lab Building, a distance of approximately 100 yards. This does not constitute "readily available".

Your cooperation with us is appreciated.

Sincerely,



George H. Smith, Chief  
Fuel Facility and Materials  
Safety Branch

cc:

D. B. Holzgraf, Nucleonics Manager  
J. W. Paradiso, Reactor Supervisor  
C. Konnerth, Health Physicist  
R. Bollinger, Vice President, Medical Products Division