



UNION CARBIDE CORPORATION  
MEDICAL PRODUCTS DIVISION  
P.O. BOX 324, TUXEDO, NEW YORK 10987  
TELEPHONE: 914-351-2131

September 24, 1979

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

Attn: George H. Smith, Chief  
Fuel Facility & Materials Safety Branch

Subj: Inspection 70-687/79-03

Dear Sir:

This report of the above referenced inspection identified certain activities that allegedly were not conducted in full compliance with NRC requirements. Our comments on these inspection findings are respectively as follows:

ITEM A & E

Items A and E were corrected before the completion of the inspection so these items need not be addressed in this reply (as stated in the letter accompanying the inspection report).

ITEM B

We have completed a review of personnel exposure history forms for all radiation workers presently employed and have cleared up any inconsistencies of record keeping. In the cases for which NRC-4 forms were not included in the dose histories, the files have been segregated and a separate listing of these persons has been prepared. Employees listed will not be placed into jobs which might raise their accumulated whole body exposure above 1.25 Rem per quarter year.

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ITEM B (cont'd)

With regard to the employee exposed above 1.25 Rem per quarter year, please note that the lifetime permissible exposure had been calculated and logged for the NRC-5 form although this determination was not shown on NRC-4. Therefore, the proper evaluation had been performed. The error was one of record keeping rather than a failure to make the determination as alleged.

Regardless, we are concerned about a repeat of a NRC-4 record keeping error. Therefore, the dose histories for new employees will be held in a "suspense" file until all exposure history information is documented. The exposure file for the new employee will then be transferred to the master file of personnel exposures. While an employee's records are in the "suspense" file the employees exposure will be limited to less than 1.25 Rem per quarter.

ITEM C

Urinealyses were performed on Hot Laboratory personnel working with uranium-235 during 1978. The beta-gamma analysis was performed on these individuals since fission products are the only isotopes detected in sufficient quantities to warrant a bioassay spot check. This is based on continuous air sampling performed in the uranium solution and plating labs.

As a verification of low airborne uranium, we are sending 1978 urine samples to an independent assayer for uranium-235 analysis.

ITEM D

In order to enhance our existing hand and foot monitoring for alpha control, we have recently ordered a portable hand and foot monitor for alpha which will double as a contamination monitor for the welding lab.

With this new monitor in operation, we will have portable alpha monitoring equipment in all areas where uncontained uranium-235 is handled.

Please note that, although the portable alpha detector near the Plating Area on the second floor was inoperative on the date of the inspection, fixed monitors for hand and foot counting were operating and available. Also note that the portable alpha monitor was returned to the Plating Area monitoring station before the completion of the inspection.

ITEM F

Item F states that on July 11, 1979 the fuel storage cabinet in the plating area on the second floor of the Hot Lab contained approximately 200 microCuries of uranium-235, and the cabinet was not posted as required under 10 CFR 20.203 (f).

There is some confusion concerning this item of noncompliance, 10 CFR 20.203 (f) refers to the labeling of containers not storage cabinets. It also further states (Paragraph 3 (VI)) "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". Our FNMCP clearly shows that access to the containers in these storage cabinets is only by those individuals designated as MBA #1 custodians and the cabinet logbook is a readily available written record which identifies the material in the containers which are stored in the cabinets.

In conclusion, we feel that this item of noncompliance does not apply to the storage cabinets and that we are not required under 10 CFR 20.203 (f-3-VI) to label the containers in the storage cabinets.

ITEM G

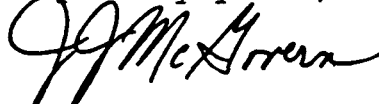
Our practice regarding particulate air samples is to log a counts per minute result on the weekly form for this purpose. This result is then transferred to a master sheet and listed in the units of microCuries per milliliter.

Although the raw counting data results were not transferred during the period cited, we were aware that they represented insignificant releases since the counts were at the minimum detectable activity.

However, there is no problem with making the microCurie per milliliter entry at the time of counting and this will be done from now on.

All of the above corrective actions either have been or will have been accomplished within one week after this response.

Very truly yours,



James J. McGovern  
Business Manager  
Radiochemicals

LCT/DDG:js

cc: R. E. Bollinger  
D. D. Grogan

C. J. Konnerth  
L. C. Thelin

M. H. Voth