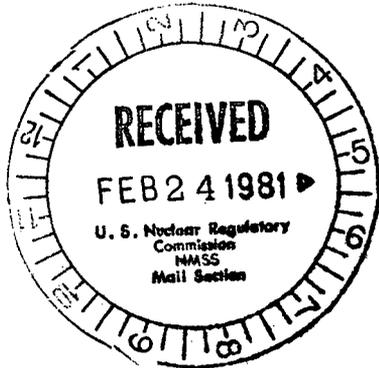


70-687



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

REGULATORY OPERATIONS  
FILE COPY

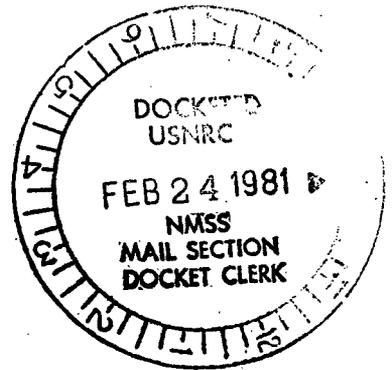


February 9, 1981

U. S. Nuclear Regulatory Commission  
Material Control & Accountability  
Licensing Branch  
Division of Safeguards  
Mail Stop 881SS  
Willste Building  
7915 Eastern Avenue  
Silver Spring, MD 20910

Attn: Mr. R. Jackson

Gentlemen:



The Materials and Plant Protection Amendment 3 to the Union Carbide Corporation SNM-639 license, item 7.2 prescribes item checks of discrete items and containers of SNM daily. It is requested that the wording of item 7.2 be amended to read as follows:

"Accurate records shall be established and maintained which provide on a daily basis knowledge of the identity and location of all unirradiated SNM in discrete items and containers.

This change is requested because daily item checks of irradiated SNM has become impractical; however, by reason of the fact that this material has been irradiated, it is rendered self-protected within the definition of 10 CFR 73.6 b.

Applicant	.....
Check No.	28027
Amount/Fee Category	.....
Type of Fee	.....
Date Check Rec'd	2/19/81
Received By	.....

18518

February 9, 1981

There are from 75 to 100 discrete items or containers which hold irradiated SNM at any time during routine operation. a general breakdown of these items follows:

<u>Location</u>	<u>Item</u>	<u>Quantity</u>	<u>Radiation Level @ 3'</u>
Reactor Core	Irradiation Target	28 ea.	~5000 Rem/hr. each
Hot Cell	Irradiation Target	1 to 6 ea.	5000 Rem/hr. each
Hot Cell	U & fission pdt. waste solutions (~15 gms ea.) in septum sealed bottles.	20 to 60 ea.	100 to 5000 Rem/hr. each
Hot Cell	U Oxide with fission pdts.	1 to 26 ea.	100 to 1000 Rem/hr. each

It is not practicable to perform daily item checks on irradiation targets in the reactor core because it would require that the reactor be shut down each day and all of the targets would have to be removed. This would seriously hinder efficient isotope production. All other irradiated SNM is located in the hot cells where processing goes on practically continuously 6 days per week. Radiochemical separation operations would have to be interrupted if daily item checks were required.

Because these items are self-protected by contained radioactivity and because of the security measures<sup>1</sup> employed, we believe that daily item checks of this material are unnecessary. Any unauthorized diversion would require special knowledge and equipment which would prevent such diversion from being carried out without detection. Daily item checks will be made on all unirradiated material.

<sup>1</sup>UCC Physical Security Plan forwarded to the Commission 5/18/80.

February 9, 1981

The new wording of 7.2 that is hereby requested also omitted the word "quantity" as an ingredient of the item check. Although each MBA custodian could assess the approximate amount of material contained in discrete items other than sealed targets by noticing the volume of solution, quantity of powders and qualities such as colors and textures of material, an absolute determination of quantity cannot be made unless the material contained is sampled and assayed. Since we do not believe it is the intent of this license condition to require daily assays, we request that the word "quantity" be left out.

For the above reasons, we believe this license change can be made without endangering life, property and the common defense.

A check in the amount of \$150.00 is enclosed for the fee prescribed by 10 CFR 170.31. 1. G for an administrative license amendment.

Thank you for your consideration.

Very truly yours,

  
James J. McGovern  
Business Manager  
Radiochemicals

JJMCG:js  
Enclosure (CHECK \$150.00)

18518

William O. Miller  
License Fee Management Branch  
Office of Administration

IC # \_\_\_\_\_  
SG # \_\_\_\_\_  
MCL# 07000687A03M  
PSL# \_\_\_\_\_

MATERIALS SAFEGUARDS AMENDMENT CLASSIFICATION

Applicant Union Carbide

License No: SNM-639 Fee Category: 1D

Application Dated: 2/9/81 Received: 2/12/81

Applicant's Fee Classification: Administrative

The above application for amendment has been reviewed by the NMSS' Division of Safeguards in accordance with Section 170.31 of Part 170 and is classified as follows:

1. Safeguard amendments to licenses in fee Categories 1A through 1H
  - (a) \_\_\_ Major Safeguards
  - (b) \_\_\_ Minor Safeguards
  - (c) \_\_\_ Safeguards (Categories 1D through 1G only)
  - (d)  Administrative

2. Justification for reclassification: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. The application was filed (a) \_\_\_ pursuant to written MRC request and the amendment is being issued for the convenience of the Commission, or (b) \_\_\_ Other (State reason): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: Pa Bright

Division of Safeguards, NMSS

Date: 2/12/81

*Don Dumbauld*  
*Steve*  
*Applicant*  
*OK*  
*PA*  
*2/13/81*

*Amendment Request*  
*re. 7.2*