

APPENDIX A

NOTICE OF VIOLATION

Combustion Engineering, Incorporated

Docket No. 70-1100

Based on the results of an NRC inspection conducted on June 5-8, 1979, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC License No. SNM-1067 and federal regulations as indicated below. Items A through C are infractions.

- A. License Condition 9 incorporates Section 8.1, "Nuclear Laboratories" of the licensee's approved license application, page VIII-2, Revision 4, dated September 16, 1974, and Section 8.2, "Nuclear Fuel Manufacturing-Windsor" of the licensee's approved license application, page VIII-5, Revision 4, dated March 15, 1978, which require, in part, that Management is responsible for the nuclear safety and radiological safety related to all Special Nuclear and Source Material used and will assure that all operations involving nuclear materials have been analyzed to establish required safety units and controls.

Contrary to the above, on June 6-7, 1979,

- 1) Management did not assure that radiological safety controls had been established in that alpha survey instruments were not available for use by personnel at the change line of a posted contaminated area located along side the emission spectrograph located in Building 5 and at the exit to the posted contaminated area located in Building 6 so that personnel exiting these areas could survey hands, clothes and shoes for radioactive contamination.
- 2) Management did not assure that all operations involving nuclear materials had been analyzed to establish the required safety limits and controls in that the required safety limits and controls had not been established on the Predry Airflow velocity for the Blending Operation. The procedure, "OS 1580, Revision 4, dated May 24, 1978", stated that this velocity should be "per engineering instruction". However, no engineering instruction was available to the operator. When the operator turned on the air at a rate of 1600 CFH at Station No. 1, a puff of UO₂ powder was observed exiting the top of the blender enclosure. 2

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- B. License Condition 9 incorporates Section 15.9, "Personnel Protection Equipment" of the licensee's approved license application, page XV-13, Revision 1, dated April 16, 1973, which requires, in part, that uranium handlers shall use gloves.

Contrary to the above, on June 6, 1979,

- 1) An unclad uranium handler was observed handling demonstrated contaminated containers at the powder blending station lift in the Batch Make-Up Area while he was not wearing gloves.
- 2) An unclad uranium handler was observed wearing cloth gloves while handling wet, unclad uranium fuel pellets in the bowl of the centerless grinder feed mechanism. Cloth gloves would allow the operator's hands to become contaminated.

- C. License Condition 9 incorporates Section 8.2., "Nuclear Fuel Manufacturing-Windsor" of the licensee's approved license application, page VIII-6, Revision 7, dated March 15, 1978, which requires, in part, that all procedures and limits will be reviewed and approved by the Nuclear Licensing and Safety Supervisor before issuance.

Contrary to the above, on June 8, 1979, all safety related procedures were not reviewed and approved by the Nuclear Licensing and Safety Supervisor before issuance in that of 25 procedures examined, 19 were not approved by the Nuclear Licensing and Safety Supervisor and 4 had specific revisions but not subsequent revisions approved by the Nuclear Licensing and Safety Supervisor.