

# GENERAL ELECTRIC

NUCLEAR ENERGY  
PRODUCTS DIVISION

WILMINGTON MANUFACTURING  
DEPARTMENT

CASTLE HAYNE ROAD • P. O. BOX 780 • WILMINGTON, N. C. 28401 • (919) 243-5000

September 21, 1979

Mr. J. T. Sutherland  
U. S. Nuclear Regulatory Commission, RII  
101 Marietta Street, NW - Suite 3100  
Atlanta, Georgia 30303

Dear Mr. Sutherland:

References: (1) NRC Inspection Report RII:GLT, 70-1113/79-17, dated 8/3/79  
(2) NRC License SNM-1097, Docket #70-1113

Thank you for your letter referenced above which reported the results of the inspection of our fuel fabrication plant by Mr. G. L. Troup of your office on August 13-16, 1979.

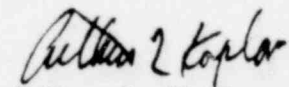
Pertaining to the item of apparent noncompliance with NRC requirements in your letter, the reply to this item is given in the attachment to this letter.

We appreciate your inspector's comments and suggestions related to our employee safety and environmental protection programs. These comments and suggestions are helpful to us in our constant efforts to improve these programs, ensure the continued health and safety of plant personnel, and ensure our compliance with NRC regulations and license conditions. We also welcome further discussion with your staff on the item in your letter and in our related reply, if necessary, for further clarification of this item.

Your inspection report referred to above does not contain information which we believe to be proprietary.

Very truly yours,

GENERAL ELECTRIC COMPANY



Arthur L. Kaplan, Manager  
Licensing & Compliance Audits  
M/C J26

ALK:bmw

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Attachment

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Mr. J. T. Sutherland  
September 21, 1979

ATTACHMENT

The information given below refers to the item in Appendix A, "Notice of Violation," in the NRC Inspection Report RII:GLT, 70-1113/79-17, dated 8/31/79. The corrective actions detailed below have already been implemented or will be implemented by the dates shown.

*As required by Condition 14 of license SNM-1097, materials and equipment released from restricted areas shall meet the contamination limits of Annex C. Annex C specifies the limits for the release of material from restricted areas as a maximum amount of fixed alpha radioactivity of 25,000 disintegrations per minute per 100 square centimeters and the average amount should not exceed 5,000 disintegrations per minute per 100 square centimeters.*

*Contrary to the above, on or about August 7, 1979, material was removed from the site restricted areas which was contaminated to levels in excess of the limits of Annex C to SNM-1097. The highest maximum level was 30,700 disintegrations per minute per 100 square centimeters and the highest average level was 14,800 disintegrations per minute per 100 square centimeters of fixed alpha radioactivity.*

*This is an infraction.*

The following steps were initiated and completed promptly after the discovery of the material which had been removed from the site:

(1) All trash removal from the site of uncontaminated trash from the fuels building was stopped and such trash on hand was sorted to assure that no further material of this type left the plant site.

(2) Contamination surveys of items which could be found on the ground at the location and of the ground surface itself were made. No excessive contamination levels were found at that time (1645 on 8/8/79) by the Manager, Licensing & Compliance Audits.

- (3) The owner of the property upon which the material was found was informed that all of the material would be removed promptly.
- (4) The contractor providing removal services was contacted and taken to the offsite location.
- (5) The contractor removed the material from the offsite location and brought it back to our plant site.
- (6) Surveys were conducted at the offsite location during and after the removal process to assure that all of the contaminated items had been removed and to assure that no residual detectable contamination remained at the location.
- (7) All of the items in the returned material believed to be potentially contaminated were surveyed as soon as returned to the plant site.

As a result of this review, the following actions have been taken to reduce this opportunity for crossover:

- (1) Two dumpsters were moved outside the fence around the fuel manufacturing building complex, one for lunchroom trash and one for computer room trash, to minimize the opportunity for crossover with contaminated trash.
- (2) All uncontaminated trash from the fuels building is being sorted and suspect items retrieved and monitored prior to release of this trash from the site.
- (3) Although we feel that the two actions described above constitute sufficient corrective actions to prevent recurrence of the noncompliance situation, we are evaluating and will continue to evaluate long-term programs which could lead to longer term engineering or other types of activities to prevent recurrence of this situation. We plan to continue the present corrective actions described above until or unless we implement additional actions as a result of our evaluations.

A. L. Kaplan  
:bmw