Nuclear Fuel Services, Inc. P.O. Box 124 • West Valley, New York 14171
A Subsidiary of Getty Oil Company (716) 942-3235

October 5, 1979
1-79-103

Mr. George H. Smith, Chief
Fuel Facility and Materials
Safety Branch
US Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Smith:

This will acknowledge and respond to your letter of September 13, 1979 (received September 17, 1979) regarding Inspection No. 50-201/79-02 conducted by Mr. P. Clemons on June 6-8, 1979 of License No. CSF-1 activities. Your inspection indicated two infractions and one deficiency which are discussed in the enclosure to this letter.

We believe the corrective actions specified in the enclosure will prevent recurrence.

Very truly yours,

J. P. Duckworth
General Manager

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Enc.

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ENCLOSURE - J. P. Duckworth to
Nuclear Regulatory Commission,
Regi-n I, October 5, 1979

NFS RESPONSE TO USNRC

REGION I LETTER TO NFS

September 13, 1979

INSPECTION NO. 50-201/79-02

NFS ITEM

A. Technical Specification 7.1.4 states:

"Detailed written procedures, run sheets, letters of authorization and extended work procedures shall be provided for operation of the plant. In addition, procedures for handling abnormal operating conditions and for radiation protection shall be provided." Item 1.2.6 of Section 6, Administration of the Health and Safety Manual states, "It is the responsibility of each employee to follow all controls, standards and procedures in order to maintain a safe work environment..."

Procedure RWP No. NFS-1, dated January 1, 1979, "Radiation Area Extended Work Procedure NFS-1," developed pursuant to Technical Specification 7.1.4, requires personnel to monitor using the hand and foot counter when leaving a Zone II area in the building lobby.

The Health and Safety Procedures Manual, the section on Personnel Monitoring "Hand and Foot Counter" states that personnel must stand on the hand and foot counter for ten seconds.

Contrary to the above on June 6, 1979, the inspector observed a licensee employee use the hand and foot counter, and the employee stood on the counter for approximately two seconds. On June 7, 1979, the inspector observed another employee monitor using the hand and foot counter and this employee also stood on the counter for approximately two seconds.

NFS RESPONSE

Corrective actions will include: (1) Requirements for monitoring on the hand and foot counter for 5 to 10 seconds as stated in the Health and Safety Manual, which is issued to all employees, will be reemphasized to employees by memo to all employees; (2) the Health and Safety Procedures Manual will be revised to read the same as the Health and Safety Manual; and, (3) the 5 to 10 second requirement will be posted conspicuously on the applicable machines.

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These programs will be completed by October 15, 1979.

NRC ITEM

B. 10 CFR 20.203(b) "Radiation Areas" states: "Each radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: 'Caution - Radiation Area'."

10 CFR 20.202(b)(2) states: "Radiation area" means any area, accessible to personnel, in which there exists radiation, originating in whole or in part within licensed material, at such levels that a major portion of the body could receive in any one hour a dose in excess of 5 millirem, or in any 5 consecutive days a dose in excess of 100 millirems."

Contrary to the above, an area near an exhaust duct on the Ventilation Exhaust Cell Roof was not posted as a radiation area. Dose rates in the area were as high as 20 millirems per hour as measured by the inspector on June 6, 1979.

NFS RESPONSE

Immediate corrective action was taken by posting a "Radiation Area" sign on the door to the Ventilation Exhaust Cell roof. Subsequent corrective action was the review of the requirements for zoning and posting with the Health and Safety personnel.

NRC ITEM

C. 10 CFR 20.203(b) "Containers" states "Each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents." A label required pursuant to the above shall bear the radiation caution symbol and the words, "Caution, Radioative Material" or "Danger, Radioactive Material."

Contrary to the above, the Oak Ridge Shipping Container, USA/6697/B, Model No. 8500, Serial No. 8471, containing licensed material, was awaiting shipment at the Warehouse Loading Dock on June 6, 1979, and it was not labeled as required, as observed the the inspector.

NFS RESPONSE

The container in question was properly labeled by 1300 hours on June 6, 1979 (approximately one and one-half hours after being noted by the inspector). In order to prevent this situation from recurring, the requirements and need for timely action has been reviewed with the persons responsible for shipping radioactive materials.