Babcock & Wilcox

Nuclear Materials Division

609 North Warren Avenue, Apollo, Pa. 15613

Telephone: (412) 842-0111

February 20, 1979

Boyce H. Grier, Director, Region I
Office of Inspection and Enforcement
United States Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Reference: Docket No. 70-364
Inspection No. 79-01

Dear Mr. Grier:

Attached are the Nuclear Materials Division, Pennsylvania Operations (PA Ops), specific responses and corrective actions relating to the disclosed items resulting from your Mr. Clemons inspection of January 9-12, 1979. Listed below is a summary of the specific responses and corrective actions which have been implemented to resolve the disclosed items and prevent recurrence of the disclosed items.

Relative to Appendix A, Item A, a smear survey of all drums stored in the Fab-8 Area has been completed by the Health and Safety Department. Future smear survey scheduling for drums stored in the Fab-8 Area has been incorporated into the Health and Safety Compliance checklist.

Relative to Appendix A, Item B, No. 1, a documented shop talk has been given to employees on the proper wearing of finger dosimeters, with emphasis directed toward the employee found not wearing a finger dosimeter.

Relative to Appendix A, Item B, No. 2, the subject meter has been properly calibrated and an improved calibration documentation system has been implemented.

Relative to Appendix A, Item B, No. 3, a documented shop talk has been given to plant personnel regarding correct monitoring techniques for exiting a controlled contamination area. Personal indoctrination has been given to the employee who did not observe proper change line procedures.

Relative to Appendix A, Item B, No. 4, Health and Safety has reconducted field inspections of all personal issue respirators and proper record documentation has been recorded on Form #309-6050. Future inspections and proper record documentation will be conducted by the Training Department during the annual respirator chamber tests.

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Relative to Appendix A, Item C, a specialized training course relating to the safe use of byproduct material and proper documentation of this training will be conducted by the Babcock and Wilcox (PA Ops) Training section. Completion of this training is expected by March 1, 1979.

If you have any questions concerning these corrective actions, please contact me.

Very truly yours,

David G Outs /fc

Michael A. Austin
Manager, Technical Control

DGO/mhb

Attachment

SPECIFIC NUCLEAR MATERIALS DIVISION (PENNSYLVANIA OPERATIONS) RESPONSES
TO NUCLEAR REGULATORY COMMISSION INSPECTION (REGION I) OF JANUARY 9-12, 1979
(REFERENCE INSPECTION REPORT NO. 70-364/79-01)

INFRACTION:
APPENDIX A, ITEM A

Amendment #80 to Special Nuclear Material License No. SNM-414 permits the storage of shipping containers containing uranium...in the Fab 8 area. Item 9 of Amendment #80 states, "At least every six months and prior to removal of any container or drum from the Fab 8 area, a complete smear survey of the container or drum shall be made and recorded."

Contrary to the above, at least ten containers, containing up to 310 kilograms of UO_2, were stored in Fab 8 during 1978 and these containers were not smear surveyed at six month intervals as required.

SPECIFIC RESPONSE:

A smear survey of all drums stored in the Fab-8 area has been completed by the Health and Safety Department. Future smear survey scheduling for drums stored in the Fab-8 area has been incorporated into the Health and Safety Compliance checklist. Additionally, a memo has been issued to Health and Safety technicians assigning responsibilities and listing the requirements for Fab-8 drum storage. These corrective actions are expected to prevent recurrence of this disclosed item.

INFRACTION:
APPENDIX A, ITEM B, NO. 1

Amendment #110 to Special Nuclear Material License No. SNM-414 incorporates Section 6.1.5 and 6.5.2.2 of an application dated September 23, 1975. Section 6.1.5 requires that employees be given the necessary tools, equipment, and procedures to safely perform their work. Section 6.5.2.2 requires that procedures, specifications, and license conditions be complied with. Procedures were not complied with in the following instances:

Health and Safety Manual, Section 5.2.1, developed pursuant to Amendment #110, states, in part, "All personnel who normally work in restricted areas are issued dosimeters...Dosimeters, if issued, must be worn at all times in restricted areas...".

Contrary to the above, a licensee employee who had been issued a finger dosimeter did not wear the dosimeter as he worked in a glove box in Fab 1 of the Plutonium Facility, a restricted area, on January 9, 1979, as observed by the inspector.

SPECIFIC RESPONSE:

The employee not wearing a finger dosimeter while working in a glovebox has received individual indoctrination reemphasizing the requirement and importance of wearing finger dosimetry. Employees required to wear finger dosimeters have been given a documented shop talk on the proper wearing of finger dosimeters. Additionally, a memo has been issued to all Plutonium facility personnel stating when finger dosimeters must be worn. These corrective actions are expected to prevent recurrence of this disclosed item.

APPENDIX A, ITEM B, NO. 2

Operational Health and Safety Procedures Manual, Health Physics Procedure #21, developed pursuant to Amendment #110, requires portable survey instruments be calibrated on a quarterly basis or after each repair.

Contrary to the above, a portable survey instrument, located in Fab 9, was not calibrated on a quarterly basis as required. It was last calibrated on July 26, 1978.

SPECIFIC RESPONSE:

The Victoreen Radgun, Model AGB-10KG-SR, Serial No. 1644, was calibrated and documented in the Quality Assurance calibration recall system on July 26, 1978. During the early part of September this instrument was inadvertently dropped and damaged to the extent that it required a new meter movement. Instrument repair personnel removed the Radgun from service on or about September 5, 1978, which was prior to the expiration of quarterly calibration. Repairs were made on October 23, 1978. Quality Assurance calibrated and returned the instrument for use on November 7, 1978, however, the calibration information was not recorded in the Quality Assurance calibration recall system. Calibration information for this instrument has now been properly documented. Additionally, an improved Quality Assurance calibration documentation system, including computer originated reminders, has been established and is expected to prevent future recurrence of this disclosed item.

APPENDIX A, ITEM B, NO. 3

Health and Safety Manual, Section 5.2.16, developed pursuant to Amendment #110, states, "Upon exiting from a controlled contamination area, all personnel are required to monitor clothing and shoes...".

Contrary to the above, a licensee representative failed to perform the required monitoring as he exited the controlled contamination area in the change room of the Plutonium Facility, as observed by the inspector, on January 9, 1979.

SPECIFIC RESPONSE:

The employee exiting a controlled contamination area to a contamination-free area without monitoring himself has received personal indoctrination on proper change line procedures. The employee did monitor at the first monitoring station, located on the controlled contamination side of the change line. This monitoring station was established to effectively control the spread of contamination at the change line areas. A documented shop talk has been given to plant personnel regarding correct monitoring techniques for exiting a controlled contamination area. Additionally, a memo relating to correct monitoring techniques has been issued to Plutonium Facility salaried personnel and will be conspicuously posted for a temporary period with the permanently posted monitoring instructions at the Plutonium Facility monitoring stations. The Health and Safety Manual has also been changed to clarify the monitoring procedure required upon exiting a controlled contamination area. These corrective actions are expected to prevent recurrence of this disclosed item.

APPENDIX A, ITEM B, NO. 4

Operational Health and Safety Procedures Manual, Health Physics Procedure #21, Item #4, developed pursuant to Amendment #110, states, "If the employee to be mask tested has his/her own personal mask, conduct a field inspection of the mask per the inspection procedure on the reverse side of Form #309-605D". Form #309-605D has a statement at the top of the page which states, "Use if the employee has personal mask".

Contrary to the above, the personal masks of at least six employees were inspected during 1978 according to a licensee representative, but the inspection results were not documented as required by Form #309-605D.

SPECIFIC RESPONSE:

Field inspections of personal respirators issued to employees had been conducted, however, proper record documentation on Form #309-605D was not completed. A list of employees issued personal respirators has been forwarded to site Health and Safety supervision by the Training Department. Utilizing this list, Health and Safety technicians have reconducted the field inspections ensuring all personal issue respirators have been subjected to the required field inspection and proper record documentation has been recorded on Form #309-605D. Future inspections and proper record documentation will be conducted by the Training Department during the annual respirator chamber tests. These corrective actions are expected to prevent recurrence of this disclosed item.

DEFICIENCY:
APPENDIX A, ITEM C

Amendment #115 to Special Nuclear Material License No. SNM-414 states, "Records of employee training shall be documented". Addendum #13, Section 3.2 of the Health and Safety Manual, developed pursuant to Amendment #110, requires all employees who will work with byproduct material be given specialized training before being allowed to perform independently.

Contrary to the above, the licensee does not have documentation stating that the employee using byproduct material to calibrate portable survey instruments has received the required specialized training.

SPECIFIC RESPONSE:

A specialized training course relating to the safe use of byproduct material will be conducted by the Babcock and Wilcox (PA Ops) Training section. Both theoretical and practical training will be given to employees that work with byproduct material. Proper documentation of this training will be completed and maintained on file with the Training section. Completion of this training is expected by March 1, 1979. These corrective actions are expected to prevent recurrence of this disclosed item.