C-E Power Systems
Combustion Engineering, Inc.
1000 Prospect Hill Road
Windsor, Connecticut 06095

Tel. 203/688-1911
Telex: 99297

POWER SYSTEMS

December 5, 1979

License SNM-1067
Docket 70-1100

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. George H. Smith, Chief
Fuel Facility & Material Safety Branch

Reference: Letter from Mr. G. H. Smith to Mr. H. V. Lichtenberger, dated November 13, 1979; Inspection 70-1100/79-07

Gentlemen:

This is in response to the above referenced letter in which you reported various items of noncompliance that were determined during your inspectors' visit to our facility on September 18-21, 1979.

Appendix A, Item A

One employee employed on April 24, 1978 and another employee employed on May 22, 1978 were not included in the June 1978 urine bioassay program.

Response

Both of these employees were included in the urine bioassay program conducted in October 1979. The results for all personnel sampled were less than the minimum detectable concentration of 1 µgm/liter. A checklist of all employees required to participate in the urinalysis program has been implemented to assure that no employees are missed in the future. We are in full compliance at this time.

Appendix A, Item B

Equipment was released from the Pellet Shop of the Manufacturing Facility, a restricted area, for unrestricted use and items were not monitored for fixed contamination, radioactivity on the interior surfaces of equipment was not determined, and records were not maintained showing the identity of the recipient of the equipment released.

Response

All items released for unrestricted use are now monitored for fixed as well as removable contamination and the identity of the recipient is documented. It is our intent to request deletion of the latter requirement in our license renewal application next year as this requirement serves no safety-related purpose. Radio-

8002140067

Appendix A, Item B-Response (Cont'd)

activity on the interior surfaces of equipment released for unrestricted use is determined in each case. However, this practice is not adhered to for equipment which is released to another controlled area covered by License SNM-1067. Labels which read "Possible Internal Contamination" are attached to the equipment and the recipient is asked to notify Health Physics if disassembly becomes necessary. We are in full compliance at this time.

Appendix A, Item C

Several employees were missed during the semi-annual Pellet Shop training in the manufacturing facility and one employee did not receive training during 1978 and 1979 in the Nuclear Laboratories.

Response

All of the above employees received the required training during October 1979. An employee checklist has been established for all manufacturing personnel to assure that all personnel receive the required training and are included in the urinalysis and whole body count programs consistent with federal regulations and License SNM-1067. Additional training sessions are now established for employees who miss the regularly scheduled sessions. We are in full compliance at this time.

Appendix A, Item D

Two employees leaving unclad fuel handling areas did not monitor their clothing for the presence of radioactive contamination.

Response

Those employees who wear laboratory coats and shoe covers and enter unclad fuel handling areas are observing only and as such have only a remote possibility of becoming contaminated with UO_2. All production processes are carried out in closed ventilated systems and hoods. All equipment is routinely cleaned to levels which are as low as possible. Floors are cleaned once per shift and sometimes more frequently, but as an added precaution, all visitors and observers are required to wear a laboratory coat as well as shoe covers to provide a further margin of safety in contamination control. All persons leaving the unclad fuel handling area are required to monitor their hands. If contamination is suspected on any other part of the body or clothing, a portable alpha monitor is available to check for contamination. We consider these precautions sufficient to provide an adequate contamination control program. It appears that the intended monitoring requirements were not made clear in our original license application. It was our intention that all regular production workers be required to wear a complete suit of protective clothing and be required to monitor their hands (as a minimum) when exiting contaminated areas. It was also our intention that all visitors and observers be required to wear a laboratory coat and shoe covers and also be required to monitor their hands (as a minimum) and to additionally check any other part of the body or personal clothing with the available alpha monitor if contamination is found on the hands or contamination is suspected on any other part of the body. It is out intent to amend License SNM-1067 at the time of our renewal next year to clear up the poor semantics in Section 15.10. We believe we are in full compliance with the intent of License SNM-1067 and regret that the wording was not more carefully reviewed at the time our original application was submitted.

Appendix A, Item E

An employee's BZ sample was not counted and calculated after each 4 hour period as required for employees whose 7-day running total exceeds 2.5 MPCD.

Response

This third shift employee was performing routine operations at the time and his 7-day average was 2.52 MPCD. The third shift health physics technician was reprimanded and was reminded of his responsibility to assure that the requirement to count mid-shift samples is strictly adhered to in the future. We are in full compliance at this time.

Appendix A, Item F

An employee terminated his employment on January 31, 1979 and the reports required by 10 CFR 20.408 were not submitted within 90 days of his termination.

Response

This was an oversight on the part of the Radiation Specialist responsible for submitting these reports. This oversight happened at the time the previous Radiation Specialist had terminated and the present Specialist was being hired. The required reports were submitted on August 1, 1979. We are in full compliance at this time.

Appendix A, Item G

A cabinet in the Building #18 High Bay Annex containing uranium was not conspicuously posted inasmuch as a sign stating Caution-Radioactive Material was completely covered.

A safe located in Building #5 was posted with a 'Caution-Radioactive Material' label, but the label did not identify the contents and neither did it contain sufficient information to permit individuals working in the vicinity to take precautions to avoid or minimize exposures.

Response

The required postings were completed prior to the inspectors' leaving our facility. Closer attention will be paid during times of construction to assure that no posting is blocked from view and postings for all storage areas will be reviewed more frequently to assure all requirements are complied with. We are in full compliance at this time.

Appendix A, Item H

Records that are maintained as equivalent to Form NRC-5 do not contain employee's social security number, name of licensee, and method of monitoring as required by Form NRC-5.

Response

Record forms that are maintained as equivalent to Form NRC-5 will be revised to include the above required information. Our records will be in full compliance for the calendar quarter beginning January 1, 1980.

Appendix A, Item I

Several closed containers located in the Pellet Shop Annex which contained SNM-bearing waste materials were not labeled to indicate the enrichment and the uranium content.

Response

The containers referred to are 17-H drums used for the packaging of low-level radioactive waste. All waste drums will be labeled with an approximate weight of special nuclear material at the time the drums are closed. An assay of each drum to accurately determine its contents will then be performed within 7 days after closure of the drums. All drums will be labeled as to enrichment at the time they are closed. Our operating procedures are presently being revised to incorporate the labeling described above. We will be in full compliance within 60 days of the date of this letter.

Very truly yours,

H. V. Lichtenberger
Vice President-Nuclear Fuel
Nuclear Power Systems-Manufacturing

HVL/GJB/ssb