PDR

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DEC 2 2 1978

FCPF:NK
70-33
SNM-23

Texas Instruments, Inc.
ATTN: Dr. John W. Ross, Manager
Energy Products
Attleboro, Massachusetts 20703

Gentlemen:

We have reviewed your emergency plans submitted with your letter dated October 25, 1978. Additional information (see enclosure) is necessary to show the plan meets the requirements of 10 CFR 50, Appendix E. A copy of Regulatory Guide 3.34 is enclosed to assist you in evaluating the potential radiological consequences of accidental nuclear criticality.

In order to meet our schedule for completion of the review of your emergency plans, your response to the requested additional information should be received within 45 days of the date of this letter.

Sincerely,

W. T. Crow

W. T. Crow, Section Leader
Uranium Fuel Fabrication Section
Fuel Processing & Fabrication Branch
Division of Fuel Cycle and
Material Safety

Enclosures:
As stated

7901300007

ENCLOSURE

Comments on Texas Instruments, Inc.
Amendment Application, Docket No. 70-33
Dated October 25, 1978

1. Page 1-1 Justification has not been provided for the assumption an accidental criticality incident is not credible (e.g., >5 elements in rinse tank - closely spaced). Regulatory Guide 3.34, "Assumptions Used for Evaluating the Potential Radiological Consequences of Accidental Nuclear Criticality in a Uranium Fuel Fabrication Plant" should be used in developing the scenario for the postulated criticality accident. Multiple breakdowns in the nuclear criticality safety controls are assumed.

2. Page 2-1 Radiological emergency assistance should be obtained from the DOE Brookhaven Area Office. The NRC does not have a radiological emergency assistance team.

3. Page 3-1 (a) The fire fighting protection available on-site should be specified (e.g., fire department, fire brigade); (b) what NRC emergency response is indicated in Table 1?

4. Page 4-3

   (a) If destruction of the HFIR Project Facility is possible, provide justification that off-site personnel will not be affected.

   (b) A criticality accident may be classified as a site emergency or a general emergency depending on the dose at the site boundary. The possible dose from a criticality accident should be developed as a function of distance from Building 10 (see Regulatory Guide 3.34).

5. Page 5-3

   (a) The members of the off-site emergency team present at the facility during off-shift hours should be specified.

   (b) What members of the HFIR Project staff are available during off-shift hours to direct activities involving SNM?

6. Page 5-4 In the event of an emergency associated with radiological safety, during off-shift hours, who is qualified to take the required action until the evaluation team arrives?

7. Page 5-7

The responsibility for notification of governmental authorities and for the release of information to news media during an emergency (coordinated with governmental authorities) should be assigned.

8. Page 6-7

(a) Are TI supplied equipment and supplies maintained at the responding emergency agreement organizations' facilities (e.g., Attleboro Fire Dept.)? If so, who is responsible for the periodic testing of their condition and their appropriate maintenance?

(b) The basis for a decision by the agreement organization director whether equipment and supplies should be distributed to his emergency support personnel should be clarified.

9. Page 6-8

If a criticality accident is possible, exposure guidelines are required for emergency rescue personnel.

10. Page 6-9 Arrangements should be made for backup hospital and medical services.

11. Page 8-1 The on-site fire fighting team should be identified and the associated training and retraining programs specified.

12. Page 8-2 Drills and exercises and their frequency should be specified for the fire brigade members.

13. Page 8-4 The minimum frequency for testing the operational readiness of emergency equipment and supplies should be specified.

14. Page 9-1 The maximum contamination levels to allow personnel to return to the SNM areas should be specified.

15. Appendix

(a) Under what conditions will the Attleboro Fire Department not provide ambulance service?

(b) Under the exceptions to the agreement with the Attleboro Fire Department, who provides ambulance service?

(c) Alternate hospital facilities should be specified for use in the event the Rhode Island Hospital cancels the agreement with TI (note Rhode Island Hospital's right to cancel the agreement).

(d) A copy of the letter of the agreement with the Winchester Engineering and Analytical Center (WEAC) for emergency whole body counting of personnel for the purpose of radiological assessment should be included.

(e) A copy of the letter of agreement with the Bolton and Diffley Laboratories for emergency bioassay services should be included.

(f) Plots of calculated time-distance-dose are required for the most serious postulated design basis accident (e.g., a postulated criticality accident).

(g) Fire fighting personnel may require protective clothing (see Section 10.5.10.2).

(h) A listing, by general category, should be included of emergency kits, protective equipment, and supplies that are stored and maintained for emergency purposes.

UNITED STATES
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WASHINGTON, D. C. 20555

JAN 24 1979

FCTR:RHO
71-9001

General Electric Company
ATTN: Mr. D. M. Dawson
175 Curtner Avenue
San Jose, CA 95125

Gentlemen:

This refers to your Certificate of Compliance No. 9001 for the Model No. IF-300 shipping container.

The certificate will expire on December 31, 1979. Because the certificate references consists of an application and 26 supplements, we request that you submit a consolidated application, with drawings, incorporating all previous submittals.

The consolidated application need not include your Quality Assurance Program since this information has been submitted separately under 10 CFR §71.51. The application should continue to include quality control requirements and operating procedures.

The consolidated application (eight copies) should be submitted prior to October 1, 1979 in order that a revised certificate can be issued prior to the December 31, 1979 expiration date.

Sincerely,

Charles E. MacDonald, Chief
Transportation Branch
Division of Fuel Cycle and
Material Safety

cc: Carolina Power & Light Company
ATTN: Mr. E. E. Utley
PO Box 1551
Raleigh, NC 27602

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