



NAVAL AIR REWORK FACILITY  
NAVAL AIR STATION  
NORTH ISLAND  
SAN DIEGO, CALIFORNIA 92135

IN REPLY REFER TO:  
OOF/MFR:sr  
Ser 422  
17 DEC 1979

From: Commanding Officer, Naval Air Rework Facility, Naval Air Station,  
North Island  
To: Director, United States Nuclear Regulatory Commission, Region V,  
1990 N. California Boulevard, Suite 202, Walnut Creek Plaza,  
Walnut Creek, CA 94596  
Via: Commander, Naval Aviation Logistics Center, Naval Air Station,  
Patuxent River, MD 20670 (Code 10)  
Subj: Nuclear Regulatory Commission Inspection  
Ref: (a) United States Nuclear Regulatory Commission ltr of  
15 November 1979

1. This command received an inspection by a representative of the Region V office of the U.S. Nuclear Regulatory Commission on October 22 and 23, 1979. Reference (a) forwarded a Notice of Violation which cited certain activities which appeared to be in non-compliance with NRC requirements under NRC License No. SMB-1346. Reference (a) has been closely reviewed and the cited items are being rectified as will be discussed in this letter. A copy of reference (a) is enclosed for reference by the Naval Aviation Logistics Center.

2. Reference (a) levied a general criticism that the items of non-compliance identified during the inspection indicated a lack of management control of the licensed program and an apparent lack of understanding of NRC rules and regulations. The following actions have been taken to rectify these deficiencies:

A. Management review revealed that a copy of Title 10 - Chapter 1, NRC Rules and Regulations, was not held by the command's Radiation Safety Officer, who is charged with the responsibility for administration of the licensed program. A copy of these Rules and Regulations has since been purchased and placed in the custody of the Radiation Safety Officer. Management emphasis is insuring that all personnel who have any responsibility for the licensed program are becoming intimately familiar with these Rules and Regulations.

B. The Radiation Safety Officer is a specialist trained in his field, who is assigned to the Occupational Safety and Health Manager's Staff. To increase the Radiation Safety Officer's span of control and effectiveness in the administration of the licensed program, an Ionizing Radiation Control Committee has been established. This committee is chaired by the Radiation Safety Officer and comprises membership from all of the work areas within the organization that have to meet any of the

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requirements specified by the NRC. A command directive is in writing to define the charter and functions of this committee in the over all administration of the licensed program and in the control of radiation materials.

C. To improve program management effectiveness, the Radiation Safety Officer has established a loose-leaf manual which includes the names of all employees who work with thoriated magnesium and the due dates of their annual physical examination. This manual also includes the following records:

- (1) Quarterly Air Sample Tests
- (2) Annual inventories and surveys of Thoriated Magnesium Materials
- (3) Americium 241 Wipe Tests
- (4) Radiacmeter Calibration Schedules
- (5) Film Badge Records
- (6) Microwave Inspection Records

Possession and maintenance of the information in this manual will provide the Radiation Safety Officer real-time visibility of the status and condition of the important elements of the licensed program.

3. The following information is submitted in response to the specific deficiencies cited in Appendix A of Reference (a):

A(1). An Ionizing Radiation Control Committee has been established as described previously.

A(2). No wet blasting is being accomplished outside of the designated wet blast area on the first floor of Building 379.

A(3). Signs stating "No Eating, Drinking, and Smoking will be Permitted in the Area while Thoriated Magnesium is being "Worked" are being manufactured. Signs will be completed and posted prior to 12 December 1979. The first line supervisor will enforce this regulation.

A(4). No dry grinding or blasting of components is being performed in the shop area. Enforcement will be insured by the first line supervisor.

A(5). An inventory which was performed on 23 November 1979 indicates that 1125.7 Kilos of thoriated magnesium castings are on board. This inventory will be updated annually.

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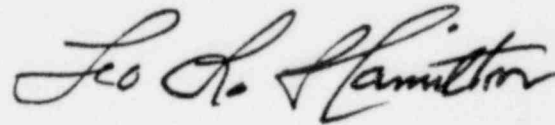
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A(6) A survey of work stations and storage areas is now being conducted monthly.

B. Quarterly air sampling in the immediate and surrounding areas where thoriated magnesium is being worked will commence during second quarter of Fiscal 1980. It is felt that quarterly sampling can suitably detect out of normal conditions for the range of working conditions.

C. Current copies of Parts 19 and 20 of 10 CFR 19.11(a) are posted in accordance with 10 CFR 19.11(b).

4. The inspection and resulting report by Ms. B. A. Riedlinger of your office has been of great assistance to this command in identifying areas in need of corrective action. I wish to extend my thanks to Ms. Riedlinger for the thoroughness and professional dedication she exhibited during her inspection, and for the advise she has provided towards improvements in the administration of our licensed program.



Copy to:  
COMNAVAIRSYSCOM (AIR-09E4) (w/copy reference (a))  
NAVAVNLOGCEN (Code 10) (w/copy reference (a))