

U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

REGION I

Report No. 80-03

Docket No. 50-201

License No. CSF-1 Priority 1 Category RP

Licensee: Nuclear Fuel Services, Incorporated  
Suite 600  
6000 Executive Boulevard  
Rockville, Maryland 20352

Facility Name: West Valley Reprocessing Plant

Inspection At: West Valley, New York

Inspection Conducted: March 26-28, 1980

Inspectors: P. Clemons  
P. Clemons, Radiation Specialist

4/16/80  
date

\_\_\_\_\_  
date

Approved by: P. Knapp  
P. Knapp, Chief, Radiation Support Section,  
FF&MS Branch

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date  
4-18-80  
date

Inspection Summary:

Inspection on March 26-28, 1980 (Report Number 50-201/80-03)

Areas Inspected: Routine, unannounced inspection by a regional based inspector of the Radiation Protection Program including: outstanding items, procedures, respiratory protection, radiation areas, labeling, dosimetry, bioassay, audits, radiation surveys, smears, instrument calibration, annual report, termination report, posting, leak tests, organization and training. Shortly after arrival, areas where work may have been performed were examined to review radiation control procedures and practices. The inspection involved 18 inspector-hours on site by one regional based inspector.

Results: Of the 17 areas inspected, no items of noncompliance were identified in 16 areas. One apparent item was identified in one area (Infraction - failure to whole body count - paragraph 4).

## DETAILS

### 1. Persons Contacted

Mr. P. Burn, Technical Services Manager  
Mr. J. Duckworth, General Manager  
Mr. G. Metzger, Health and Safety Supervisor  
Mr. C. Seitter, Quality Assurance Supervisor  
Mr. R. Smokowski, Health and Safety Manager

The inspector also interviewed other licensee employees during the course of the inspection. They included the Assistant Operations Manager and Health and Safety personnel.

### 2. Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (201/79-02-01): Failed to monitor properly. The inspector reviewed a memo that had been issued by the General Manager to all employees emphasizing the fact that proper monitoring techniques must be observed.

(Closed) Noncompliance (201/79-02-03): Failure to post a radiation area. The inspector noted that a door leading to the Exhaust Cell Roof, a radiation area, had been posted.

(Closed) Noncompliance (201/79-02-04): Failed to label container. The inspector was informed that the container had been labeled prior to the completion of the previous inspection.

(Closed) Noncompliance (201/80-01-01): Failed to post Hard Stand. The inspector observed that the Hard Stand had been properly posted.

### 3. Licensee Internal Audits

Technical Specification 7.1.6 states, "Audit of Operations Management shall provide for periodic audits of the operations...with regard to radiological and nuclear safety. These audits shall be performed by competent company or other technical personnel not directly responsible for the operation audited."

The inspector reviewed an audit report of the Health and Safety Program which stated that the required audit was conducted by a corporate staff member who was not directly responsible for the operation audited, on May 29-30, 1979.

The inspector also reviewed records of audits of the radiation protection program conducted by the Quality Assurance Department as required by Section 1.2.4 of the Health and Safety Manual, developed pursuant to Section 7.1.4 of the Technical Specifications. The records reviewed were for the period July-December 1979.

No items of noncompliance were identified.

4. Whole Body Count

The licensee is required to perform whole body counts on employees at a stated frequency.

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 4.2.C of Section 4, Personnel Monitoring, of the Health and Safety Manual, developed pursuant to the above states, "Whole body counts are taken on all radiation workers prior to employment, annually thereafter...to verify no significant quantities of fission products are internally deposited."

The inspector requested a list of radiation workers, which was given to him. Using the list, the inspector asked a licensee representative to demonstrate that a random selection of employees had been counted annually as required.

The licensee representative gave the inspector the whole body count record log. The inspector reviewed the records for 1978 and 1979. He noted that all personnel had been counted in 1978, and he also noted that at least three of these employees had not been counted in 1979 according to the records. The inspector asked if this was indicative of the fact that the employees had not been counted in 1979. He was told that apparently that was the case.

The inspector stated that failure to whole body count the radiation workers at least annually represents noncompliance with the license conditions. (80-03-01)

5. Dosimetry

The inspector reviewed dosimetry records for approximately 30 employees for the period July through December 1979 to determine if the licensee was in compliance with the regulatory requirements. The records indicated the exposures for the period reviewed were well within acceptable limits.

No items of noncompliance were identified.

6. Annual Report

10 CFR 20.407(b) requires the licensee to submit personnel exposure and monitoring reports to the Director of Management and Program Analysis, USNRC, within the first quarter of each calendar year.

The inspector reviewed the licensee's report that was submitted to the Director on February 22, 1980. The report indicated that 100 people had been monitored during the year, and the maximum dose reported for two people was between 0.750 and 1.00 Rem. The inspector verified that one employee received 0.800 Rem and the second employee received 0.900 Rem.

No items of noncompliance were identified.

7. Termination Report

10 CFR 20.408 states: "When an individual terminates employment with a licensee subject to Section 20.407, or an individual assigned to work in such a licensee's facility, but not employed by the licensee, completes his work assignment in the licensee's facility, the licensee shall furnish to the Director of Inspection and Enforcement, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, a report of the individual's exposure to radiation and radioactive material, incurred during the period of employment or work assignment in the licensee's facility, containing information recorded by the licensee pursuant to Sections 20.401(a) and 20.108. Such report shall be furnished within 30 days after the exposure of the individual has been determined by the licensee or 90 days after the date of termination of employment or work assignment, whichever is earlier.

10 CFR 20.409(b) states: "When a licensee is required pursuant to Section 20.405 or Section 20.408 to report to the Commission any exposure of an individual to radiation or radioactive material, the licensee shall also notify the individual. Such notice shall be transmitted at a time no later than the transmittal to the Commission, and shall comply with the provisions of Section 19.13(a) of this chapter."

The inspector reviewed documentation which indicated that the required reports had been submitted to the Director and to the two individuals who terminated employment with the licensee during 1979.

No items of noncompliance were identified.

8. Routine Surveys

Section 5.1 of the Health and Safety Manual, developed pursuant to Technical Specification 7.1.4, states that the Health and Safety Department routinely monitors for smearable contamination, radiation levels and airborne concentrations.

The inspector reviewed appropriate records for the period July - December 1979 to determine if the licensee was complying with the license condition and also to determine that no regulatory requirements were being exceeded.

No items of noncompliance were identified.

9. Instrument Calibration

Section 5.3 of the Health and Safety Manual, developed pursuant to Section 7.1.4 of the Technical Specifications, describes certain instruments and the requirement that the instruments be calibrated. The inspector reviewed the schedules established for instrument calibration, and selected approximately five portable survey instruments to determine if they had been calibrated at the scheduled frequency during the period July to December 1979.

No items of noncompliance were identified.

10. DOP Test

Technical Specification 6.5.1 requires certain filters be tested (if they are changed) with particulates of appropriate size to establish that the installed filters provide a collection efficiency of 99.95% for particulates 0.3 microns in diameter or larger.

The inspector reviewed appropriate records and noted that absolute filters on three systems had been changed. The filters were changed on August 31, 1979, September 17, 1979 and September 19, 1979. The inspector noted that in each instance, the DOP test had been performed.

No items of noncompliance were identified.

11. Training

During 1979 the licensee hired three new employees to work in the restricted area. The inspector asked a licensee representative to demonstrate that the employees had received appropriate training as required by 10 CFR 19.12. The inspector was given documentation for each individual that indicated that they had received the required training.

On March 26, 1980, the inspector observed two contractor employees being trained by the Health and Safety personnel in 10 CFR 19.12 requirements. These individuals were to perform work in the restricted area.

No items of noncompliance were identified.

12. Facilities and Equipment

The inspector toured the facilities and examined equipment and instrumentation to verify that the items were available for use and maintained in an operable state. The inspection included examination of continuous air monitors, survey meters, the stack monitor, and area monitors.

No items of noncompliance were identified.

13. Posting and Labeling

The inspector reviewed the facility posting against the requirements of 10 CFR 19 and 10 CFR 20, and observed that the licensee was in compliance with the regulations. The inspector also observed that high radiation areas were locked and posted, and radiation areas were posted as required. The entire facility was posted in compliance with the regulations.

No items of noncompliance were identified.

14. Medicals

Section 9.3 of the Health and Safety Manual, developed pursuant to Section 7.1.4 of the Technical Specifications, requires yearly physical examinations for each employee. The inspector selected the names of six employees and asked a licensee representative to demonstrate that the employees had physical examinations during 1979. The records indicated that all had been examined during the year as required.

The inspector was informed by the Health and Safety Manager that appropriate employees are also examined yearly to determine if they are psychologically fit to wear respirators.

No items of noncompliance were identified.

15. Plant Safety Committee

The Plant Safety Committee is required to review and approve all standard operating procedures annually as stated in Section 7.1.6 of the Technical Specifications. The inspector reviewed minutes of Plant Safety Committee meetings for the period March-December 1979. The minutes indicated that the Committee reviewed numerous procedures during the period. The inspector reviewed the following procedures that had been reviewed during the stated period:

SOP No. 02-5, Revision 9, Centrifuge and Drumming Station Operation

SOP No. 1-38, Revision 3, Operation of the FRS Ventilation System

SOP No. 1-39, Revision 1, NFS-4 Cask Handling

SOP No. 9-2, Revision 8, Solid Radioactive Waste Disposal

SOP No. 15-12, Revision 11, Laundry Operations

No items of noncompliance were identified.

16. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on March 28, 1980. The inspector summarized the purpose and the scope of the inspection and the findings as presented in this report.