

GENERAL  ELECTRIC

NUCLEAR ENERGY
PRODUCTS DIVISION

WILMINGTON MANUFACTURING
DEPARTMENT

CASTLE HAYNE ROAD • P. O. BOX 780 • WILMINGTON, N. C. 28401 • (919) 343-5000

February 29, 1980

Mr. J. T. Sutherland
U. S. Nuclear Regulatory Commission, RII
101 Marietta Street, NW - Suite 3100
Atlanta, Georgia 30303

Dear Mr. Sutherland:

References: (1) NRC Inspection Report RII:PWS, 70-1113/80-1,
dated 2/5/80
(2) NRC License SNM-1097, Docket #70-1113

Thank you for your letter referenced above which reported the results of the inspection of our fuel fabrication plant by Mr. P. W. Steele of your office on January 21-25, 1980.

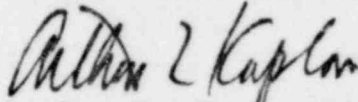
Pertaining to the two items of apparent noncompliance with NRC requirements in your letter, the replies to these items are given in the attachment to this letter.

We appreciate your inspector's comments and suggestions related to our employee safety and environmental protection programs. These comments and suggestions are helpful to us in our constant efforts to improve these programs, ensure the continued health and safety of plant personnel, and ensure our compliance with NRC regulations and license conditions. We also welcome further discussion with your staff on the items in your letter and in our related reply, if necessary, for further clarification of these items.

Your inspection report referred to above does not contain information which we believe to be proprietary.

Very truly yours,

GENERAL ELECTRIC COMPANY


Arthur L. Kaplan, Manager
Licensing & Compliance Audits
M/C J26

ALK:bmw

NSD-I

Attachment

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The information given below refers to the two items in Appendix A, "Notice of Violation," in the NRC Inspection Report RII:PWS, 70-1113/80-1, dated February 5, 1980. The corrective actions detailed below have already been implemented or will be implemented by the dates shown.

A. Condition 9 of the license requires that licensed material be used in accordance with statements, representations and conditions of Appendix A, as contained in the licensee's application. Section 4.1 of Appendix A requires that operations and activities shall be directed by the designated area manager who shall establish written operating procedures. Written operating procedure PROD 80.05, Receiving and Shipping of UF₆ cylinders, paragraphs 5.5 and 5.6, requires that cylinders on the floor awaiting loading must be temporarily chocked and that cylinder valve protectors must be used when cylinders are in transit or stored without a protective overpack.

Contrary to the above, on January 24, 1980, five full UF₆ cylinders were temporarily stored on the floor with no chocks, with no valve protectors, and not in overpacks.

This is a deficiency.

The operators and foremen responsible for activities related to transporting, storing and using UF₆ cylinders on our site have been reinstructed concerning proper transportation and storage of these cylinders.

Documentation related to this reinstruction and related to their understanding of these requirements will be available by March 24, 1980.

B. Condition 9 of the license requires that licensed material be used in accordance with statements, representations and conditions of Appendix A, as contained in the licensee's application. Paragraph 4.6.2 of Appendix A requires that changes which could

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involved a change in the analysis on which criticality safety was established shall be analyzed and approved in writing by the criticality safety function and documented by a written criticality analysis.

Contrary to the above, on January 24, 1980, uranium hexafluoride cylinders were stored in a location and configuration for which no criticality safety analysis had been performed.

This is a deficiency.

As of January 24, 1980, no full cylinders of uranium hexafluoride have been stored in the truck aisleway. Our operating procedure for that area has been modified to provide only for in-transit storage of such cylinders for a period not to exceed 24 hours.

Storage in this location will not be resumed until completion of an appropriate written criticality analysis.

A. L. Kaplan
: bmw