



UNITED STATES DEPARTMENT OF COMMERCE
National Bureau of Standards
Washington, D.C. 20234

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U. S. Nuclear Regulatory Commission
Region I
Attn: Mr. George H. Smith
Chief, Fuel Facility and
Materials Safety Branch
631 Park Avenue
King of Prussia, PA 19406

Gentlemen:

Subject: Response to Inspection No. 70-398/80-02

This is in response to your letter of March 27, 1980, to Mr. R. P. Bartlett, Jr., regarding Inspection No. 70-398/80-02 conducted on February 27-29, 1980, by Mr. J. Roth of your office.

With specific regard to the infraction outlined in the Notice of Violation contained in Appendix A to your letter, please be informed that all Type B and large quantity radioactive materials shipments from NBS have been terminated, effective March 21, 1980, until a Quality Assurance Program for Shipping is submitted to and approved by the U. S. Nuclear Regulatory Commission. In effect, this interim action will avoid further items of noncompliance regarding the QAP provisions in question. The NBS Health Physics Unit is developing a QAP and it will be submitted in May 1980 to the USNRC-NMSS for approval. We are most anxious to be able to resume shipments of the radioactive materials in question and to be in compliance with the applicable USNRC requirements therefor.

Regarding our assumption that the IAEA Certificate of Competent Authority referenced in the Notice of Violation constituted a special permit, thus exempting NBS from the requirements specified in 10CFR Part 71.10, that assumption was based on a number of discussions and the results of a past inspection. These included discussions with the Office of Hazardous Materials (OHM), DOT, at various times, particularly during certificate renewals; a discussion with Mr. Serabian of USNRC Region I, on December 12, 1979, during which our Mr. Hobbs informed him that we were drafting a contingency QAP plan for shipments for which the special permit would not apply; a discussion with Mr. Carriker of OHM-DOT, on March 3, 1980, concerning QAP's, special permits and certificates, during which time he agreed with our assumption; and USNRC Inspection No. 70-398/79-02, during which no mention was made of a relationship between a QAP and the documents on which the current inspection is centered. These documents are used for recording routine radioactive materials shipments, other than radioactive wastes, in our materials control program.

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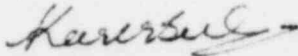
2.

In response to the comment in your letter that certain aspects of training required in IE Bulletin 79-19 had not been conducted for our employees involved in packaging, transfer and transportation of radioactive materials, please be informed that the required training was completed on March 26, 1980. The enclosure hereto contains copies of documentation on file regarding the type of training given to whom and when it was given.

The additional constructive comments in the details of the inspection report for which responses were not requested have been considered and either have been or will be incorporated in our overall radiation safety program as applicable.

Thank you for having brought these matters to our attention.

Sincerely,



Karl E. Bell
Deputy Director for
Administrative Systems

Enclosure

RECEIVED
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ENCLOSURES

1. HP Staff Training (March 5, 1980)
2. Radioactive Waste Training Classes (March 25, 1980)
3. HP Staff Training (March 26, 1980)

HP Staff Training

10:00 - 11:30 am, 3/5/80

Trainer: Hobbs

Attendance: Cassidy, Eggert, Hoaney, Kroll, Moore,
Randel, Terry, Tynes

Handouts:

- * Table of Irradiation Limits information sheet
- * RAM Shipping and Receiving Instructions and information
- * NBS-796, Shipper's Certification for Radioactive Materials
- * Deletion of NBS-366, Record of Inspection for Radioactive Materials, information note
- * 12/3/79 memo to users, Interim Procedures for Radiation Safety
- * 11/28/79 memo, as above, with revised HP documents and attached HP staff memo of 11/26/79, Interim Procedures for Radiation Source Control

Topics and discussions:

- * Limits table and 10CFR 19, 20, 30, 31, 32, 33, 40, 50, 70, 71, 73
- * Shipping and receiving instructions
- * Shipper's certification and information sheets
- * Quality assurance program; exempt, Type A and B shipments
- * Notes, memos, and revised HP documents on source control
- * Need to generate RAW (waste) instructions, note SNM/liquid/short-lived/cross-contaminated containers
- * Storage for HP documents in any HP room in 235 or 245
- * Compactor operators' training to be 3/11/80; 2 to 3: Paul and Fred show Debbie, George, and Jim; 3 to 4: Keith, Debbie, and George show John K. and Tiny
- * George and Debbie in charge of waste program
- * Need method for checking all trash from controlled areas
- * Training plans for HP staff and users

Enclosure 1



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March 25, 1980

MEMORANDUM FOR Mr. Thomas G. Hobbs
Acting Chief, Health Physics

From: Paul R. Cassidy *PRC*
Health Physicist

Subject: Radioactive Waste Training Classes

Radioactive waste training classes were given by Paul Cassidy and Fred Moore, Jr., on March 11 and March 18, 1980, to the following people:

John Kroll
Keith Eggert
George Randel
Carroll Tynes
Jim Terry
DeBorah Hoaney

The following topics were demonstrated or discussed:

Protective clothing
Respirators
Air sampling
Surveys - surface and contamination
Documentation
Compactor operations
Non-compactible waste
Labelling, marking
Package inspection, closure

Enclosure 2



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March 26, 1980

MEMORANDUM FOR Health Physics File

From: Thomas G. Hobbs *TGH*
Acting Chief, Health Physics

Subject: HP Staff Training

Attendees: Cassidy, Eggert, Hoaney, Kroll, Moore,
Randel, Terry, Tynes

Trainer: Hobbs

Topics: Emergencies - response times and modes, survey meters and
monitoring, responsibilities

Shipping - Quality Assurance Program, halt on Type B and
large quantity RAM, certification form, DOT
specifications, DOT regulations

Surveillance - Moore/Tynes are responsible for 235/245
surveys per draft procedure and floor
monitoring, instructions, survey meters,
drains and outfalls locations

cc:
HP Staff

Enclosure 3