

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 030-12542/89002(DRSS)

Docket No. 030-12542

License No. 34-09024-05

Licensee: Uniroyal Goodrich Tire Company (Uniroyal)  
Akron, OH 44720

Meeting Conducted: Tuesday, October 17, 1989

Meeting At: Region III Office, Glen Ellyn, Illinois

Type of Meeting: Enforcement Conference

Inspection Conducted: September 27-29, 1989

Inspectors: *R. J. Caniano For*  
W. P. Reichhold  
Radiation Specialist

*Oct 25, 1989*  
Date

*Colleen Casey*  
C. C. Casey  
Radiation Specialist

*Oct. 25, 1989*  
Date

Reviewed By: *Roy Caniano*  
Roy Caniano, Chief  
Nuclear Materials Safety  
Section 2

*Oct 25, 1989*  
Date

Approved By: *Bruce S. Mallett*  
Bruce S. Mallett, Ph.D., Chief  
Nuclear Materials Safety Branch

*Nov. 2, 1989*  
Date

Meeting Summary

Enforcement Conference on Tuesday, October 17, 1989 (Report  
No. 030-12542/89002(DRSS))

Areas Discussed: The apparent violations found during the special inspection;  
Uniroyal's corrective actions and recovery efforts; and the applicability of  
the NRC's enforcement policy to the violations.

## DETAILS

### 1. Conference Attendees

#### Uniroyal Goodrich Tire Company

J. Maloney, Radiation Protection Officer, Akron, Ohio Office  
J. Harner, Plant Manager, Woodburn, Indiana Plant  
D. Merchant, Plant Engineer, Woodburn, Indiana Plant  
D. Stuart, Systems Engineer, Woodburn, Indiana Plant  
D. Minc, Assistant General Counsel

#### U.S. Nuclear Regulatory Commission, Region III

C. E. Norelius, Director, Division of Radiation Safety and Safeguards  
W. H. Schultz, Enforcement Coordinator  
B. A. Berson, Regional Counsel  
B. S. Mallett, Chief, Nuclear Materials Safety Branch  
G. M. McCann, Chief, Materials Licensing Section  
J. R. Madera, Senior Licensing Reviewer  
R. J. Caniano, Chief, Nuclear Materials Safety Section 2  
W. P. Reichhold, Radiation Specialist

#### Enforcement Conference

An enforcement conference was held in the NRC Region III office on October 17, 1989. This conference was held to discuss the circumstances surrounding the loss of gauges containing radioactive material, and the apparent violations found during the inspection performed on September 27-29, 1989. The inspection findings were documented in Inspection Report No. 030-12542/89001(DRSS), sent to Uniroyal on October 13, 1989.

The purpose of this conference was to: (1) review the apparent violations and Uniroyal's corrective actions, (2) determine if there were escalating or mitigating circumstances, and (3) to discuss Uniroyal's efforts to recover the gauges.

Uniroyal representatives did not contest any of the apparent violations and were in agreement with the NRC's understanding of the facts.

Uniroyal representatives discussed status of the operations to find the one, unrecovered gauge. They stated that the scrap yard has reduced the scrap pile where the gauge is assumed to be located by 30% since they restarted their shearing operations. Uniroyal is confident that the missing gauge is in the scrap pile and will be found. Uniroyal confirmed that they would follow the action plan submitted to the NRC if the gauge was found.

Uniroyal also discussed their immediate and long term corrective actions, which included the following:

1. Posting new NRC-3 forms.
2. Adding the birthdates of the employees to the film badge records.
3. Calibrating the G-M survey meter on October 12, 1989.

4. Developing an extensive radiation training program for all employees.
5. Decreasing the leak test frequency to four months.
6. Issuing a new "Radiation Safety Policy" that covers the use of radioactive materials at the plant.
7. Establishing a new inventory procedure and record.
8. Establishing an emergency plan in case of fire or explosion in areas where radioactive material is used.
9. Establishing a maintenance log book that is used when work on nuclear gauges is done.
10. Establishing a "Radiation Safety Management Schedule" that will be reviewed monthly.
11. Amending the license to name a new Radiation Safety Officer for the Woodburn, Indiana Plant, change the mailing address to the Woodburn, Indiana Plant, add new gauges, and incorporate above corrective actions.

Uniroyal representatives also stated that they had discussed these problems with their other plants that had nuclear gauges.

In response to Uniroyal's corrective actions, NRC representatives recommended that Uniroyal should consider that the readings on their G-M survey meter may need to be corrected due to the type source used to calibrate the meter. The NRC representatives also recommended that Uniroyal establish a system to verify that employees read radiation safety training letters. Uniroyal was also informed that a Notice of Violation requiring a written response would be coming and that the NRC has several enforcement options in this case, which could include a civil penalty.