

To: NRC  
Attn: Document Control Desk  
Washington, DC 20555

October 9, 1989

From: Michael Fenton

In Re: Notice of Violation  
Docket #040-03149  
License #SUB-491

Concerning Violation A.

Inspector H. Bermudez and Mike Fenton discussed this violation. Inspector Bermudez stated that if Fenton takes the following actions, the requirements would be satisfied and Fenton would be in compliance.

- \* In addition to the radionuclide respirator and disposable plastic gloves presently worn by the mixing personnel, Inspector Bermudez recommends the use of disposable plastic shoe covers to be worn while inside the uranium storage room.

Action taken:

Disposable plastic shoe covers have been purchased. All persons authorized to enter the uranium storage room have been instructed to wear them. Instruction has been posted on the uranium storage room door.

- \* Inspector Bermudez recommends a step-off pad to be located at the entrance to the uranium storage room.

Action taken:

A step-off pad has been put into use and all personnel authorized to enter the uranium storage room have been instructed in its proper use.

- \* Inspector Bermudez recommends a weekly janitorial effort in the uranium oxide storage room.

Action taken:

Because the uranium storage room is so seldom used, (no uranium has been used since before the August 23rd inspection) a semiannual clean-up schedule has been posted on the room door.

- \* Inspector Bermudez recommends a detection instrument be attached to the air collection system which serves the uranium storage room to be sure the air collection system is working up to its capacity.

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Action taken:

- \* A differential pressure measuring device has been ordered and will be installed by November 1, 1989.

Considering the extremely minimal exposures of Fenton employees to uranium oxide (see A, B and C below) and considering the additional actions taken in response to Inspector Bermudez's recommendations, I feel that The Fenton Art Glass Company is providing a reasonable level of protection.

- A. From the time the person enters the room, collects the uranium, weighs it, and leaves the room, three to four minutes have elapsed. During 1989, Fenton has used 18.6 lbs. of uranium oxide. This quantity was divided into four portions. To gather each portion took from 3 to 4 minutes. So far this year, one Fenton employee has spent a total of 16 minutes or less in this room.
- B. While the employee scoops uranium oxide from the drum, places it on the scale, and returns the left over portion to the drum, every effort is made to minimize possible dusting.
- C. While this employee is in the uranium storage room, he is wearing a radionuclide respirator.

Concerning violation B.

Fenton has not obtained a urinalysis since 1984.

1. That is correct.
2. The reason for not having done this is that Fenton's usage had decreased significantly (23 lbs. used in 1988 and 18.6 lbs. in 1989) and that previous urinalysis showed negative. Since the uranium oxide handling procedures have not varied, exposure should be less.
3. Urine samples have been collected from the four persons involved and have been sent to Eberline Laboratory, Albuquerque, New Mexico, for analysis. The results have not yet been received.
4. A once every 60 month schedule for urinalysis has been permanently posted on the uranium oxide storage room door and the mixing room bulletin board to serve as a reminder to have the testing done periodically.
5. See #3.