



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 11 1980

70-162

MEMORANDUM FOR: W. T. Crow, Section Leader
Uranium Process Licensing Section
Uranium Fuel Licensing Branch

FROM: A. L. Soong
Uranium Process Licensing Section
Uranium Fuel Licensing Branch

SUBJECT: TRIP REPORT

Purpose

To visit Region I, Office of Inspection and Enforcement, King of Prussia, Pennsylvania, and Lucius Pitkin Inc. (LPI) New York City, to discuss LPI's application for renewal of SNM-137 dated April 10, 1975.

Places and Dates

1. Region I, Office of Inspection and Enforcement, King of Prussia, Pennsylvania, August 11, 1980.
2. Lucius Pitkin, Inc., New York, New York, August 12, 1980.

Discussion

On August 11, 1980, I met with Mr. J. Roth at his office at King of Prussia, Pennsylvania. He is the NRC inspector for LPI. Mr. Roth's comments on LPI's renewal application were discussed in the meeting (see Attachment #1).

On August 12, I went to Lucius Pitkin, Inc., at New York City. Dr. Rising, Laboratory Director of LPI, showed me through the work areas in the facility where the licensed materials are being used and stored. He also explained the radiation safety controls procedure for the use of the material in each area. The areas I visited were the material receiving area, sample preparation laboratories, sample measurement laboratories, and waste storage area. That afternoon, I met with Dr. Rising again to discuss the renewal application. Dr. Rising indicated that LPI is now considering three options in planning its nuclear activities:

- *1. Getting a source material license from the State of New York in case LPI becomes a referee to determine the uranium concentration in the UF₆ material (natural uranium).

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*2. Reducing the possession limit to less than 350 grams of U-235 of the present material license; therefore, the license would be authorized by the State of New York.

3. Renewing its present material license from NRC.

*LPI was notified later by NRC letter dated August 28, 1980, that they should inform NRC of their decision on this by September 7, 1980. We agreed that if LPI decides to select the third option listed above, the following additional information will be incorporated in its updated renewal application and it would be submitted to NRC by September 7, 1980:

1. Facility Description: plant layout, identify the rooms from the drawing where the licensed material will be used or stored.
2. Organization and Administrative Requirements:
 - a. provide a list of all key positions with safety-related responsibilities and their resumes,
 - b. describe the administrative controls for adopting operating, maintenance and test procedures, and confirm that the procedure shall be approved by the Safety Committee.
3. Describe a minimum surface contamination survey program for the area in which the licensed material is used or stored. The program shall include the following elements:
 - a. Survey frequencies for all areas
 - b. Action level (dpm/100 cm²) above which the corrective action shall be taken
 - c. When decontamination will be started once the contamination level was found exceeding the above level.
4. Waste disposal management: describe the origin of the wastes, method of their disposal and control.

A radiation monitoring program should also be described to ensure that stored material or waste is not leaking to the outside of the package and to ensure that radioactive effluents released to the unrestricted area shall meet the criteria specified in 10 CFR 20. The program should consist of the method of monitoring, frequency of checking, action level and action to be taken.

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Enclosure: As stated