

UNC RECOVERY SYSTEMS



Division of United Nuclear Corporation
A **UNC RESOURCES** Company

One Narragansett Trail
Wood River Junction, Rhode Island 02894

Telephone 401/364-7701

CEB: 80-121

October 1, 1980

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

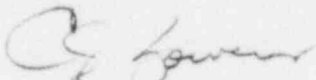
Subject: USNRC Inspection 70-820/80-05

Reference: Letter on Subject, George H. Smith to
C. E. Bowers dated September 8, 1980

Gentlemen:

Attached is United Nuclear Corporation's response to the subject inspection report, which was transmitted to us via the referenced letter. We trust that this response will satisfactorily resolve the items delineated in Appendix A of your letter. If further amplification is needed, we will of course be happy to discuss the matter with you.

Very truly yours,
UNC RECOVERY SYSTEMS


C. E. Bowers
President

CEB:RJGr:ddm

Attachment

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ATTACHMENT TO LETTER CEB: 80-121
C. E. BOWERS TO GEORGE H. SMITH
DATED OCTOBER 1, 1980
USNRC INSPECTION 70-820/80-05

A. USNRC COMMENT:

"Contrary to the requirements of subsection 207.1 of license No. SNM-777, the audit of the radiological safety program conducted in December, 1979 did not include an analysis of the radiation exposure for each work-station."

UNC RESPONSE:

Prior to the audit, the auditor was specifically apprised of the entire license requirement. Subsequent discussions with that auditor revealed that the lack of specific comment in the report does not denote that the required analysis was not done. Rather, the report's conclusion is that no items were found which the auditor considered to be of a reportable nature, other than the single item which he specifically called out.

In direct response to the NRC comment, the auditor has stated the following:

"Review of the Audit Report and supporting notes discloses that the audit conducted during December, 1979, pursuant to Section 207(?) of SNM-777 did in fact include analysis of the radiation exposure for each work station, as required by the cited license section.

The text of the audit report identified this area of review as "exposure. . . . and additional records". Review of the auditor's notes made during the audit, moreover, discloses that "semi-weekly" Beta-Gamma reports were reviewed, as were evaluations of extremity exposure potential, and that surveys were made to quantify radiation levels at or near the sources of fuel. Altogether, these reviews provided the basis for stating that the facility appears to be adhering to the ALARA principal. No problems were noted which would require more specific item discussion."

Based on the above, it does not appear that this constitutes an item of non-compliance. Even so, future audit reports will specifically address this item.

B. USNRC COMMENT:

"Contrary to the requirements of Condition No. 22 of License SNM-777, at least 50 well water samples for the period from August-November, 1979 have exceeded the gross alpha and beta concentrations and/or the nitrate concentration and the samples have not been analyzed for the major nuclides or the specific chemical elements as required."

UNC RESPONSE:

UNC fully concurs that there was an unusually long delay in obtaining the required analytical results, but questions whether this is in truth an item of non-compliance. As noted in the body of the USNRC Inspection Report, the samples had been sent to a commercial vendor for analysis. That transmittal was made in a timely manner. During the period involved, when it became evident that the vendor's normal turnaround time was being exceeded, UNC contacted them and requested that action be taken to expedite the analysis, agreeing to pay for priority analysis on some of the more important samples. Pressure was applied to the vendor to improve performance until all of the results were submitted. Recently, UNC was notified that vendor production scheduling and control problems have been resolved and that normal feedback schedules could be expected in the future. UNC will continue to closely follow this feedback timing, and take corrective action where appropriate.

It should be noted that:

- 1) Several of the samples cited in the report were damaged in transit, and thus lost for analytical purposes (replacement was not possible, as the samples are taken on a monthly basis);
- 2) The cited results are now available and show no unexpected or abnormal conditions; and
- 3) There is no turnaround time specified in the License Condition, nor is there any required action triggered by the results obtained.

Therefore, it appears that this should not be identified as an item of non-compliance.

C. USNRC COMMENT:

"Contrary to the requirements of Subsection 4.4.1 of License SNM-777, on May 14, 1980, a riding lawn mower was moved from a contaminated area to an unrestricted area, and it was not surveyed."

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UNC RESPONSE:

UNC acknowledges this deficiency. While the actual condition posed no hazard (since the lawn mower had only been in an area which is potentially contaminated, but normally is not, and it never left the protected area to go into an unrestricted area), it did constitute a minor lapse in internal procedures. When the condition was identified, the mower was immediately checked and found to be clean of any contamination. The operator was reprimanded for this lapse in compliance, and no repetitions are expected.