

UNC RECOVERY SYSTEMS

70-820

PDR
LPDR (2)

RJG 81-75

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

One Narragansett Trail
Wood River Junction, Rhode Island 02894

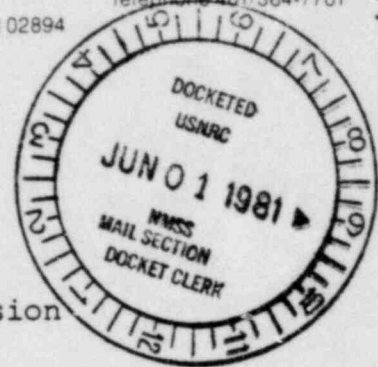
Telephone 401-364-7701

D. CRAMER
396-55



MAY 22 11 10 17

May 13, 1981



United States Nuclear Regulatory Commission
Mr. W. T. Crow, Section Leader
Willste Building
7915 Eastern Avenue
Silver Spring, MD 20910

Reference: Letter, Glenn O. Amy to W. T. Crow,
dated February 5, 1981

Gentlemen:

The referenced letter transmitted a revised Section 200 to License SNM-777. Based on subsequent conversations with R. Stevenson of your office and W. Kinney of NRC's Region I office, we have made some modifications to the earlier submittal. The modified pages are enclosed with this letter, for your review and approval.

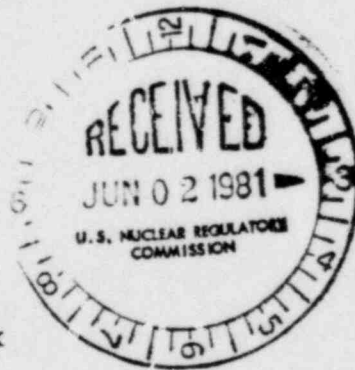
If you have any further questions or comments regarding this submittal, please contact me.

Very truly yours,
UNC RECOVERY SYSTEMS

R. J. Gregg
Plant Manager

RJG:amc

cc: G. O. Amy
K. A. Helgeson
J. H. L'Heureux



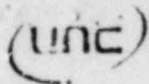
FEE EXEMPT

add info to
2/15/81 request
fee paid.

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UNITED NUCLEAR
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LICENSE:	SNM-777, DOCKET 70-820	Page 1 of 2
SECTION:	200-ORGANIZATION, PERSONNEL AND ADMINISTRATION	Approved
SUBSECTION:	205-DECONTAMINATION CONTROLS	Issued 5/13/81
		Supersedes 2/5/81

205

DECONTAMINATION CONTROL

1. GENERAL

UNC Recovery Systems' policy requires that supervision at all levels assure themselves: that all handling, processing, storing and shipping of SNM is given prior review and approval by Nuclear and Industrial Safety; that suitable control measures are prescribed; and that all pertinent regulations, controls and procedures relative to nuclear criticality safety or radiological safety are followed by supervision and all operating personnel.

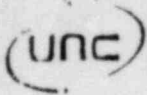
Approval by Nuclear and Industrial Safety shall be in accordance with criteria established by the license. The mechanism of such approval is described in more detail in Subsection 206.

2. DECONTAMINATION OPERATIONS

Control of decontamination operations is maintained through a system of Standard Operating Procedures (SOP's), Quality Procedures (QP's), Safety Work Permits (SWP's), Hazard Analyses, and Standard Methods, with provision for reporting and correcting abnormal occurrences. The specific control method used is dependent on the nature of the activity being performed.

2.1 Standard Operating Procedures

Standard Operating Procedures provide detailed instructions for equipment operations and material handling, including specific safety requirements. The Standard Operating Procedure Manual is the basic control document. Before issuance or revision, SOP's require independent review and written approval by Operations, Quality Assurance, and the Manager, NIS, with particular emphasis on Nuclear Safety.



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2.2 Quality Procedures

Quality Procedures are utilized to provide instructions for selected Quality Assurance functions or operations.

2.3 Safety Work Permits

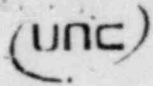
These documents are governed by SOP, and describe Nuclear and Industrial Safety requirements for performance of certain non-routine operations.

2.4 Hazard Analyses

The SWP spells out the requirements for a separate hazard analysis. The hazard analysis spells out operating criteria and/or special safety requirements or precautions to be applied to the operation described in the SWP. This is a separate document attached to the SWP.

2.5 Standard Methods

Standard methods are utilized to provide instructions for selected Health Physics functions or operations.



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SECTION:	200-ORGANIZATION, PERSONNEL AND ADMINISTRATION	Approved
SUBSECTION:	206-NUCLEAR AND INDUSTRIAL SAFETY CONTROLS	Issued 5/13/81
		Supersedes 3/1/79

206

NUCLEAR AND INDUSTRIAL SAFETY CONTROLS

1. RESPONSIBILITY

Implementation of on-site nuclear and industrial safety control is exercised by operating supervision, with organizationally independent overchecks performed by Quality Assurance or Nuclear and Industrial Safety. Operating supervision shall assure that nuclear criticality safety and health physics control procedures are followed as defined by approved operating procedures or separate written approval.

2. NUCLEAR AND INDUSTRIAL SAFETY APPROVAL

NIS approval on equipment and operating procedures is identified by signature on the operating procedures or separate written approval. This approval shall only be granted when:

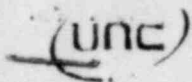
2.1 Nuclear Criticality Safety and Health Physics evaluation have been performed by NIS, based on the criteria and standards approved for this license and including verification of each of the following:

- a.) Validity of basic assumptions
- b.) Correctness of application of criteria
- c.) Completeness and accuracy of the evaluation
- d.) Specific applicability to installation

2.2 Either the evaluation or the review will be made by an individual meeting the technical qualifications for Health Physics as in 202.3. Nuclear Criticality Safety calculations for operations, processes and storage not specifically approved by sections of this license will require separate assessments by two technically-qualified individuals in nuclear criticality safety as described in 202.3.

2.3 Safety evaluations and reviews require approval by the Manager, NIS.

2.4 The Manager, NIS or consultants to the NIS department that meet the qualifications for technical competence may release changes or provide authorization for modifications without an additional



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SUBSECTION:	207-INSPECTIONS, REVIEWS AND AUDITS	Issued 5/13/81
		Supersedes 2/5/81

207 INSPECTIONS, REVIEWS AND AUDITS

GENERAL

Inspections, reviews and audits are performed to demonstrate compliance with nuclear criticality safety and radiological safety requirements, to detect any trends toward deviation from safe practices, and to confirm that radiation exposures are maintained at the "as low as reasonably achievable" level.

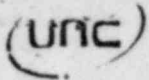
1. INSPECTION

Weekly plant inspections are performed to observe operations and equipment, and to determine compliance with approved nuclear criticality safety and radiological safety controls. The Manager, NIS will perform one of these inspections each month. Inspections are documented, and include a followup of items reported on the previous inspection to assure that proper corrective action has been taken. Inspections may also be directed toward adequacy of Standard Operating Procedures for (1) inclusion and adequacy of safety controls, (2) performance to those controls, (3) adequacy of posted signs and limits, and (4) checks of effluent measurements. Each such inspection will not necessarily include all these items. However, the individual items will be addressed at least once each quarter. Records of inspections shall be maintained for 12 months after the inspection date.

2. REVIEWS

A quarterly documented review and appraisal of the weekly inspections shall be performed by the Nuclear and Industrial Safety Manager (or by a consultant selected by him). The purpose of this review is to detect any trend toward reduction in safety or non-compliance with controls. Results of this review shall be reported to the General Manager and the Plant Manager and records maintained for one year from the date of the review. This review may be combined with the monthly inspection report.

An annual audit shall be conducted by a technically competent person(s) not directly a part of the



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plant organization and the Manager, Operations. The results of this audit shall be reported to the General Manager, the Plant Manager, and the Manager, NIS, and shall include reviews of both the radiological and criticality safety programs.

This audit shall include an analysis of Personnel radiation exposures and recommendations for action necessary to maintain personnel exposure at levels "as low as reasonably achievable".