

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report 81-01

License No. 22-00057-59MD; 22-00057-60G;
22-00057-56MA; 22-00057-58MD;
22-00057-06; 22-00057-07;
22-00057-34G; 22-00057-61

Licensee: Minnesota Mining and Manufacturing Company
3M Center
St. Paul, MN 55101

Meeting: Management meeting between licensee management and Region III
representatives on April 1, 1981.

NRC Representatives:

James A. Keppeler
James A. Keppeler
Director

4/1/81
date

C. E. Norelius
C. E. Norelius, Acting Director
Division of Engineering and
Technical Inspection

5/6/81
date

W. L. Fisher
W. L. Fisher, Chief
Technical Inspection Branch

5/5/81
date

W. H. Schultz
W. H. Schultz
Enforcement Coordinator

5-27-81
date

D. G. Wiedeman
D. G. Wiedeman, Acting Chief
Materials Radiation Protection
Section No. 1

4-23-81
date

C. T. Oberg
C. T. Oberg, Radiation Specialist,
Materials Radiation Protection
Section No. 1

4-23-81
date

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Summary:

Management meeting on April 1, 1981 (Report No. 81-01)

Areas Discussed:

Management meeting held at the NRC's request to discuss NRC's systematic assessment of licensee performance (SALP) program.

Results:

The licensee was informed that during the appraisal period the licensee's regulatory performance was acceptable.

DETAILS

1. Participants

- R. G. Wissink, Manager, Health Physics Services, 3M Company
- T. Lahr, Production Manager, Static Control Systems, 3M Company
- J. P. Ryan, General Manager, Static Control Systems, 3M Company
- B. Davis, Attorney, General Counsel, 3M Company
- L. Ludford, Senior Specialist of Corporate Communications, 3M Company
- J. G. Keppler, Director, Region III
- W. L. Fisher, Chief, Technical Inspection Branch, Region III
- C. E. Norelius, Acting Director, Division of Engineering and Technical Inspection, Region III
- D. G. Wiedeman, Acting Chief, Materials Radiation Protection Section 1, Region III
- C. T. Oberg, Radiation Specialist, Region III
- W. H. Schultz, Enforcement Coordinator, Region III
- S. Burns, Attorney, Office of the Executive Legal Director, NRC, Washington, D.C.

2. Discussion

- a. The SALP program, including development, basis for evaluation, and purpose, was summarized.
- b. The results of the NRC's evaluation of the licensee's performance were discussed.
- c. The NRC's new enforcement policy, including plans for implementation, was briefly discussed.

3. Licensee Comments

The licensee commented during the presentation of each of the areas in paragraph 2 and discussed several matters of concern as follows:

- a. Some concern was expressed over the multiplicity of management appraisals that keep plant management from performing their normal duties. They mentioned DOT surveys and DOE environmental surveys.
- b. Concern was expressed over the number of, and requested response times for the many NRC requests for action, such as IE Bulletins, NMSS questions related to licensing matters, and the 120 day response time for a Radiological Emergency Contingency Plan. They stated this is causing a significant impact on the company's ability to safely and efficiently operate and manage their business while still being responsive to NRC requests.

- c. The licensee discussed their corporate attitude and philosophy towards regulatory performance. They stated it has always been their intent to operate their facility safely and in accordance with the Rules and Regulations and that they intend to be above average in all respects.
- d. The licensee stated that they had made significant Hot Cell Modifications and that the positive benefits of these changes were just now beginning to show.

3M
PERFORMANCE EVALUATION

REGION III

LICENSEE PERFORMANCE VALUATION (MATERIALS)

Facility: 3M (Brighton Facility)

Licensee: Minnesota Mining and Manufacturing Co.

Docket No.	License No.	Category/Priority
3020825	22-00057-59MD	E/4
3011875	22-00057-60G	E/4
3010822	22-00057-56MA	K/7
3011101	22-00057-58MD	E/4
3004951	22-00057-06	B/1
3004952	22-00057-07	E1A/4
3004972	22-00057-34G	E/4
3014999	22-00057-61	E/4

Appraisal Period: August 1, 1979 - July 31, 1980

Appraisal Completion Date: October 23, 1980

Review Board Members: D. G. Wiedeman, Cognizant Acting Section Chief
A. B. Davis, Deputy Director
R. E. Burgin, Assigned Inspector
P. Guinn, NMSS Representative

A. Number and Nature of Noncompliance Items

Noncompliance Category	Jan. 1977 - July 31, 1979	Aug. 1, 1979 July 31, 1980
	Violations	0
Infractions	10 (1 Repeat)	0
Deficiencies	1	1

Areas of Noncompliance	(Action Points)	
	Jan. 1977 - July 31, 1979	Aug. 1, 1979 July 31, 1980
Transportation	-	100
Extremity Overexposures	30	
Failure to Follow Procedures	40	
Posting of Violations	10	
10 CFR 20.203 Posting	20	
Storage of Material	2	
Record	2	2
Report of Overexposure	<u>10</u>	<u> </u>

B. Number and Nature of Licensee Event Reports

(1) Licensee Reports of Damaged Static Eliminators (Reports made for General Licensees)

- June 16, 1977 - Damaged in industrial fire at Uniroyal - small area of contamination at Uniroyal
- December 21, 1978 - Three air guns containing static eliminators were damaged by fire and one was apparently destroyed and could not be found at Spartek, Inc. No contamination could be found in rubble.
- May 7, 1979 - Damaged by rubbing with auto lens assemblies at Cherry Electric Products Company. Small amount of leakage from bar.
- May 24, 1979 - Static eliminators at Budd Company plant in Van Wert, Ohio, were found to be leaking slightly due to removal of protective screens by the customer.
- August 29, 1979 - Leakage of a static eliminator at Portage Industries Plant caused by customer drilling hole in the device. Very slight contamination of facility.

March 6, 1980 - Leak package containing static eliminator from a Westbrook, Maine facility was received by 3M. Surveys by 3M, New York State and Region I show contamination limited to the Westbrook, Maine facility and local Minneapolis-St. Paul delivery truck.

(2) Part 20 Reports

January 28, 1977 - Extremity Overexposure - 19.28 rem to the left finger ring and 24.39 rem to the right finger ring in 4th quarter 1976.

January 13, 1978 - Extremity Overexposure Report - Two individuals 19.02 rem to right TLD ring finger of one individual and 20.03 rem to left TLD ring finger of second individual in 4th quarter 1977.

C. Escalated Enforcement Action

Civil Penalties

On August 6, 1980, a proposed Civil Penalty of \$2,000 was issued for one violation of DOT transportation regulations. A exclusive use vehicle which arrived at the Richland, Washington burial site was found to have an accessible area under the truck which exceeded the 200 millirem surface dose limit.

Orders

None.

Immediate Action Letters

None.

D. Management Conferences Held During Last Twelve Months

None.

E. Evaluation of Open Items and Trends

(1) A management meeting was held on June 29, 1978 in the Region III office. The topics of discussion were: Extremity exposures, management control and licensee concerns related to the March 20-23, 1978 inspection. As a result of this meeting the licensee stated that certain changes would be made to Building 575 to reduce exposures. Of these changes the changes to the new hot cell have not yet been completed. There has been about a two-fold drop in maximum and average extremity exposures to individuals working in Building 575 since the

other changes in Building 575 were made. This item is now closed due to completion of the hot cell modifications and approval for use by the Isotopes Committee on March 17, 1981.

- (2) The item of noncompliance which resulted in a civil penalty resulted from the licensee not understanding the applicable regulations and following a procedure that the licensee thought was adequate. There was no indication of a failure of management control.
- (3) The Region believes the current inspection program for this licensee should remain unchanged. The licensee appears to exercise adequate management control over the program including adequate review and audits of the program, communication within the staff, records, and adequate training for personnel. The licensee's attitude towards radiation protection is one of meeting regulatory limits.