UDC CAVAL PRODUCTS



Division of United Nuclear Corporation 67 Sandy Desert Road A UNC RESOURCES Company

Uncasville Connecticut 09382

Telephone 203, 848-1511

February 27, 1981

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

Inspection No. 70-371/80-17 - Docket No. 70-371 Subject:

Reference: Letter, G.H.Smith/D.E.Ganley, January 20, 1981

Dear Mr. Smith:

In reply to your January 20, 1981 letter, the following comments are made:

Appendix A, Item A., and Details, Item 2., Daily Checks

Only infractions and violations must be recorded, as specified in par. 2.7.2, titled "Daily Checks," of our License. Paragraph 2.7.2 further states "a technician shall report his observations to his supervisor" (i.e., if there are any items to report). Non-use of the daily check forms is not a license violation as long as competent personnel are performing the observations and recording any noted infractions or violations. Daily checks have continued to be performed, though not recorded in the same manner as during the 1976-1980 period.

Please note that par. 2.7.3 requires retention of inspection records for at least one year. Paragraph 2.7.4 requires a retention period of two years for audits. There is no retent period for daily checks in par. 2.7.2. The lack of any retention period demonstrates the lack of any license requirement for daily sneck written record.

Existing pro dures were modified, though still in compliance with

THIS DOCUMENT CONTAINS POOR QUALITY PAGES

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Mr. George H. Smith February 27, 1981 Page Two



our License. In this case, we returned to our practice of the period 1968-1976, of not recording in writing that a daily check had been performed when there was no observation of any infraction or violation. We believed this practice to be in compliance with the License as the same requirements for daily checks were in our License over those years -- 1968-1976. The daily check form was used only in the period 1975-1980, and started for a specific purpose unrelated to health physics (i.e., review of criticality postings).

Health Physics personnel, in the course of their daily visits to various plant areas for the purpose of routine or special surveys or other duties, continued to check ongoing operations/activities to insure that there were no changes in the parameters or conditions of operation that might affect the safety of these operations/activities. It should also be emphasized that our Manufacturing and Quality Control operations are required to be maintained in compliance with approved procedures under stringent process control and overchecks.

The statement made "by a Licensee representative that the daily checks had not been made" referred only to non-use of the recorded form and not to the non-performance of the daily observations.

We do not consider that a safety or License violation has occurred.

Appendix A, Item B., and Details, Item 3., Special Work Permits

As noted in Part I, par. 4.6.3, and in Part II, par. 4.6 of our License, a special work permit is used only in controlled areas of our plant involving the potential exposure to uranium contamination and (sic. uranium) radiation. This limited use of the special work permit is further supported by Section 1.2 of The Supervisor's Health Physics Guide, as shown below:

Special Work Permit

General

The primary purpose of the Special Work Permit (SWP) is to guide maintenance, service personnel and other vendors not normally working in the controlled area who have reason to perform work in an area of potential radiation contamination. Such individuals may not be aware of existing radiation conditions, nor are they expected to

evaluate them. The SWP is designated for their protection and guidance and, when properly completed, acts as a "clearance" for the work to proceed.

Request Procedure

Requests must in all cases originate with the Operating Section. It is also the responsibility of the Operating Section to obtain the advice of Health Physics and to be sure that all necessary decontamination, clean-up, etc., have been carried out before individuals start work.

It is the further responsibility of the Operating Section and Health Physics to insure that the individuals for whom the clearance is issued understand the hazards and precautions outlined in the SWP. It is up to the individuals not to deviate from the instructions.

Permit requests should include the following minimal information for Health Physics review:

Work Location

Description of Task

Number of people involved

Estimated Time Required

Tools and Equipment to be Used

Scheduled Date, Shift, and Time

Maintenance of Contaminated Equipment

A Special Work Permit is required for repair or clean-out of any large or complex contaminated equipment such as ventilation ducting, Rotoclone and Colag units.

and par. 5.4 of Manufacturing Department Procedure MDP 107, "Work Permit Procedure," as shown:

5.4 This Procedure shall not stand alone for "B" South Controlled areas.

Such areas may also require the use of a <u>Health Physics</u>

<u>Special Work Permit</u>. The use of the Health Physics Special

Work Permit is explained in the "Supervisor's Health Physics

Guide."

In addition, review of the Special Work Permit form attached to this

Mr. George H. Smith February 27, 1981 Page Four

letter also confirms its applicability to the "B" South controlled areas.

The XRP Source is accelerator-produced and not subject to NRC By-product Licensing. As noted in 10 CFR 20.1, "The use of radio-active material or other sources of radiation not licensed by the Commission is not subject to the regulation of this part.

There is no violation of our License.

Employee exposure was minimal and only a very small percentage of the natural background.

However, we will informally institute the use of a Health Physics review form on work performed on radiation-producing equipment outside of our controlled area by March 30, 1981.

Appendix A, Item C., and Details, Item 4., Label

The ISAF (Isotopic Source Assay Fissionmeter) equipment was clearly labeled as a "Neutron Source," and with the appropriate radiation caution symbol and "Caution - Radioactive Material," as noted by the inspector. The source container in the equipment was labeled with all information considered necessary by the NRC.

We do not believe additional labeling is required, since operation of the unit in the Chemical Laboratory in the "B" South area is conducted by only qualified (authorized) Chemical Laboratory personnel in compliance with 10 CFR 20.203(f)(3)(iv) and (vi' [controlled access]. "B" South access is controlled by security, access to the laboratory areas is controlled by the same security guard, access to the laboratory area is further controlled by another door, with final access to the particular Chemical Laboratory room by another door under the observation of laboratory personnel. Analyses using this ISAF source is performed only by qualified Chemical Laboratory personnel to an approved procedure.

The ISAF system is a commercially available (Guif Radiation Technology) nondestructive assay system for fissile materials.

"All required personnel shielding is built into the system. The system does not require special or shielded facilities for operation."*

^{*}Excerpt from Gulf Radiation Technology Manual RT-TB-103

Mr. George H. Smith February 27, 1981 Page Five

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Appendix A, Item C., and Details, Item 4., Label (Cont'd.)

No measurable neutron or gamma exposure has ever been detected for any laboratory personnel operating the ISAF unit.

Should further discussion of the equipment labeling be required, we suggest contact with the manufacturer of the equipment.

No License or safety violation occurred.

Appendix A, Item D., and Details, Item 5., Training

With respect to the quoted part of Appendix A, Item D., par. 2.8.1, Part I, please change your typographical error of "animal" to "annual." This type of refresher training is conducted in at least two ways, either of which is adequate to satisfy the License requirements of Part I, 2.8.1 and 2.8.3. A specific single program may be used, or a series of refresher awareness meetings, generally on a monthly basis, supplemented by specific meetings conducted to review problems detected during inspections by UNC personnel.

The subject matter presented in the period of September, 1979, through December, 1980, is sufficient to constitute a continuing refresher program. Presentation was documented. We have checked the employee grouping selected for overcheck by the NRC Inspector. We conclude that adequate documentation of their continuing reorientation exists. A sample of the type of meeting conducted is presented in Appendix I of our reply.

No License or safety violation occurred.

Appendix A, Item E., and Details, Item 6., Environmental

The sampling was not performed for reasons tolated to piping replacement in the area of sampling, and lack of diligence by a Health Physics Technician who was about to terminate to accept other employment. However, the License requirement for such sampling of materials which are not radioactive is an obsolete item in the License (i.e., nitrate, fluoride, phosphate, oils, grease, temperature, and pH). Compliance with Connecticut Department of Environmental Protection requirements shall be sufficient for non-radioactive effluents. Some of the License words are long-term carry-overs from a period prior to the establishment of the Connecticut DEP and USEPA.

Mr. George H. Smith February 27, 1981 Page Six



Appendix A, Item E., and Details, Item 6., Environmental (Cont'd.)

An amendment shall be processed to the NRC to delete this requirement. Pending this License change, we have performed the sampling plan since November, 1980.

Inspection Summary - Results

Please change "six" to "five," based on results supplied in your Appendix A.

Details, Item 7., Organization

We suggest adding some words of explanation to the understaffing noted. During the entire years of 1978 and 1979 the Health Physics Group was operated satisfactorily with four personnel. Several unusual situations have contributed to the undermanning.

- An experienced replacement for a fourth technician was hired on 11/27/79. While still awaiting Security Clearance, he terminated on 3/3/80, and went to work at another nuclear power plant. (He had been working at Maine Yankee while awaiting Clearance.)
- Our third technician terminated 7/11/80, to go to work at a nuclear power plant.
- Two Health Physics personnel were hired in May/June 1980. One left approximately 8/8/80, when his grandfather died and left him a farm.
- Our Lead Health Physics employee left our employ 11/21/80, to go to work for a nuclear power plant.
- 5. Replacements were hired on 10/16/80 and 1/27/81.

As may be appreciated:

- a. Experienced Health Physics personnel are difficult to locate and hire.
- b. A Security Clearance period of twelve to fifteen weeks is a substantial problem.

Mr. George H. Smith February 27, 1981 Page Seven



Details, Item 7., Organization (Cont'd.)

c. The Regulatory pressures upon the nuclear power plants have these businesses tying up a great portion of the market.

We are doing our utmost to maintain a cadre of Health Physics Technicians.

Details, Item 17., Ventilation

Report appears to be incomplete.

Should further information be required, please contact us.

Sincerely,

UNC NAVAL PRODUCTS

David E. Ganley

Ordanley

President & General Manager

Attach.

/r

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UNITED NUCLEAR CORPORATION HEALTH PHYSICS SPECIAL WORK PERMIT NAVAL PRODUCTS DIVISION

	APPENDIX I	
WP	NO.	

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(1)	Requested by Maintenance/Facilities Engineering/Other (circle one)
(2)	Work Location
(3)	Description of Task
	Have You Done This Task Before? YES NO (circle one)
(5)	How Many People Involved (6) Contractor Involved? NO YES Name of Contractor
(7)	People Are/Are Not Familiar With Work Requirements in a Health Physics Controlled Area. (circle one - requestor or his designee is responsible for briefing workers)
(8)	Tools and Equipment to be Used
(9)	Scheduled Date and Shift (10) Estimated Time Required Hours
11)	Requested by:Date
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To B	e Completed By Health Physics Advance Notice of Health Physics Required Before Starting This Job. YES NO
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To 8 (1) (2)	Advance Notice of Health Physics Required Before Starting This Job. YES NO Bioassay Sample Required: Before Starting Job YES NO After Work Complete - YES NO Protective Equipment Required
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To B (1) (2) (3)	Advance Notice of Health Physics Required Before Starting This Job. YES NO Bioassay Sample Required: Before Starting Job. YES NO After Work Complete - YES NO Protective Equipment Required
To B (1) (2) (3) (4)	Advance Notice of Health Physics Required Before Starting This Job. YES NO Bioassay Sample Required: Before Starting Job - YES NO After Work Complete - YES NO Protective Equipment Required

Job completed on
Lessons Learned? write on back
Cross Reference Records Retention
Bioassay
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POOR ORIGINAL

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TO: E. MAREK, A-11

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POOR ORIGINAL

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(CHAIRMAN) 3/28/80

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POOR ORIGINAL

(CHAIRMAN) 4.29.80 (DATE)

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POOR ORIGINAL

(CHAIRMAN) 5-30.80

MOTE: FOLD AND STAPLE TO RETURN.

FROM: D.E. HALSE, C-1 SUBJECT: MONTHLY EMPLOYEE AWARENESS MEETING REPORT - HOURLY Generation of Radioactive Waste in B' South Dept 5212 · Press/DeCon (C) SIGNATURES OF PERSONNEL ATTENDING: I ACKNOWLEDGE THAT I HAVE RECEIVED THE INSTRUCTIONS AND UNDERSTAND THE MATERIAL PRESENTED . 22) 2) 23) 24) 15) 25) 26) 16) _____17)_______27)______ 23) 18) 29) 19) 30) 20) (D) PERSONNEL ABSENT. 3) 5)

> (CHAIRMAN). 5.30.80

POOR ORIGINAL

NOTE: FOLD AND STAPLE TO RETURN.

(E) MANAGEMENT PERSONNEL ATTENDING:

TO: E. MAREK, A-11

TO: E. MARK ALD	MONTH	OF: JUNE 1980	
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MONTH OF: JUNE 1980

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FROM:	W.J.	MITCHELL
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POOR ORIGINAL

(CHAIRMAN)

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NOTE: FOLD AND STAPLE TO RETURN.

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POOR ORIGINAL

(CHAIRMAN)

SUBJECT: M	MONTHLY EMPLOYEE AW	ARENESS MEETING REP	ORT	(Hourly)
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EMOULE (CHAIRMAN)

MONTH OF: NOVEMBER 1980

TNEO

FROM: SUBJECT:	W.J. MITCHELL MONTHLY EMPLOYEE AWA	RENESS MEETING REPORT	HOURLY
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E. Mar-P.
(CHAIRMAN)

MONTH OF: DECEMBER, 1980 TO: E. MAREK A-11 TINED W. J. MITCHELL, C-1 SUBJECT: MONTHLY EMPLOYEE AWARENESS MEETING REPORT HOURLY (A) GENERAL INFORMATION TOPICS DISCUSSED (1) Videocaped Topics (2) Foreman Discussion Topics (a) (b) (a) D-62 Core Life Controlled Wastes Have A Safe Holiday (Security Supervisor has Classified video cape)
DEPARTMENT TOPICS DISCUSSED (B) 4) Error free Index 1) Portable exygen analyzer 5) II up grade 2) I Locker room of B. South SIGNATURES OF PERSONNEL ATTENDING: (Press I Prod & QC) I ACKNOWLEDGE THAT I HAVE RECEIVED THE INSTRUCTIONS AND * QC(6512) UNDERSTAND THE MATERIAL PRESENTED. 1) Thomas 714 Brome 11) -21) 24) 25) 26) Brench 17) 28) 18)_____ 30) 20)_ (D) PERSONNEL ABSENT: 5) 3) 1) 4) 6) (E) MANAGEMENT PERSONNEL ATTENDING: POOR ORIGINAL

"OTE: FOLD AND STAPLE TO RETURN.