

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

Region I

Report No. 50-201/81-03

Docket No. 50-201

License No. CSF-1 Priority 1 Category RP

Licensee: Nuclear Fuel Services, Incorporated
6000 Executive Boulevard
Rockville, Maryland 20352

Facility Name: West Valley Reprocessing Plant

Inspection at: West Valley, New York

Inspection conducted: April 22-24, 1981

Inspectors: *P. Clemons*
P. Clemons, Radiation Specialist

6/15/81
date signed

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6/15/81
date signed

Approved by: *P.J. Knapp*
P.J. Knapp, Chief, Facility Radiological
Protection Section

Inspection Summary:

Inspection on April 22-24, 1981 (Report No. 50-201/81-03)
Areas Inspected: Routine unannounced inspection by a regional based inspector of the Radiation Protection Program including: outstanding items, special work permit, annual report, termination report, dosimetry, audits, routine surveys, bioassay, whole body count, instrument calibration, DOP test, posting and labeling, and facilities and equipment. Shortly after arrival, areas where work may have been performed were examined to review radiation control procedures and practices. The inspection involved 18 inspector-hours onsite by one regional based inspector.
Results: Of the 13 areas inspected, no items of noncompliance were identified in 12 areas. One apparent item of noncompliance was identified in one area (Backup man failed to sign the special work permit, paragraph 3).

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DETAILS

1. Persons Contacted

Mr. C. Alday, Operations Manager
Mr. J. Duckworth, General Manager
Mr. J. Meade, Training Coordinator
Mr. G. Metzler, Health and Safety Supervisor
Mr. R. Smokowski, Health and Safety Manager
Mr. D. Wilcox, Health and Safety Specialist

The inspector also interviewed other licensee employees during the course of the inspection. They included the Assistant Operations Manager, and Health and Safety personnel.

2. Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (201/80-06-02) Failed to maintain survey records. The licensee stated that the corrective action taken was a Health and Safety Department review of monitoring practice and follow-up documentation. The inspector reviewed a memo dated February 6, 1981 that summarized the Health and Safety Department review.

(Closed) Noncompliance (201/80-06-01) Failed to sign Special Work Permit (SWP). The inspector reviewed a memo dated February 6, 1981 that was distributed to appropriate personnel with reference to the importance of complete documentation on the SWP. This item was noted again during the inspection.

3. Special Work Permit

As the inspector reviewed completed Special Work Permits (SWP) for the period January through March, 1981 for completeness, he noted that an SWP dated February 13, 1981 required a "back-up man," and he also noted that the back-up man had not signed the SWP, SWP No. 9721, "(1) Calibrate instrument (2) Lube valves" in FRS-WTA lower level. FRS is the Fuel Receiving and Storage area and WTA is the Water Treatment Area, a high radiation area.

The inspector was informed by a licensee representative that the work had been done on the date cited above.

Technical Specification 7.1.4 states, "Detailed written procedures, run sheets, letters of authorization and extended work procedures shall be provided for operation of the plant. In addition, procedures for handling abnormal operating conditions and for radiation protection shall be provided." Item 3.4 of Section 3, Special Work Permit (SWP), of the Health and Safety Manual, developed pursuant to the above states, "All entries into zone 4 areas or high radiation areas require a Special Work Permit (SWP). . .

Whenever anyone except Health and Safety has to work alone in a zone 4 or high radiation area, a qualified individual must be assigned to check on the wellbeing of the person in work area. This back-up person must sign the SWP on the front beneath Health and Safety Technician."

During Inspection 80-06 the inspector noted that Supervision was required to approve Special Work Permits when entries are made into zone 4 areas or high radiation areas. The inspector also noted that an entry was made into a high radiation area on September 2, 1980 and the Special Work Permit had not been signed to indicate approval by Supervision. This was cited as an item of noncompliance.

The inspector noted that failure to sign the SWP as required represents noncompliance with the Technical Specification. (81-03-01)

This is a Severity Level VI Violation.

4. Annual Report

10 CFR 20.407(b) requires the licensee to submit personnel exposure and monitoring reports to the Director of Management and Program Analysis, USNRC, within the first quarter of each calendar year.

The inspector reviewed the licensee's report that was submitted to the Director on February 20, 1981. The report indicated that 83 people had been monitored during the year, and the maximum dose reported was between 0.750 and 1.00 Rem for two people. The inspector verified that the maximum exposure received was 850 millirem by one employee.

No items of noncompliance were identified.

5. Termination Report

10 CFR 20.408 requires a licensee to submit to the Director of Management and Program Analysis an individual's exposure report when the individual terminates employment with the licensee.

10 CFR 20.409 requires the licensee to also notify the individual when the exposure information is being submitted as required by 10 CFR 20.408.

The inspector reviewed documentation which indicated that the required reports had been submitted to the Director and to the one individual who terminated employment with the licensee during 1980.

No items of noncompliance were identified.

6. Dosimetry

The inspector reviewed dosimetry records for approximately 30 employees for the period January-March, 1981 to determine if the licensee was in compliance with the regulatory requirements. The records indicated the exposures for the period reviewed were well within acceptable limits.

No items of noncompliance were identified.

7. Licensee Internal Audits

Technical Specification 7.1.6 states, "Audit of Operations Management shall provide for periodic audits of the operations...with regard to radiological and nuclear safety. These audits shall be performed by competent company or other technical personnel not directly responsible for the operation audited."

The inspector reviewed an audit report of the Health and Safety Program which stated that the required audit was conducted by a corporate staff member who was not directly responsible for the operation audited, on August 4, 1981.

No items of noncompliance were identified.

8. Routine Surveys

Section 5.1 of the Health and Safety Manual, developed pursuant to Technical Specification 7.1.4 states that the Health and Safety Department routinely monitors for smearable contamination, radiation levels and airborne concentrations.

The inspector reviewed appropriate records for the period January-March 1981 to determine if the licensee was complying with the license condition and also to determine that no regulatory requirements were being exceeded.

No items of noncompliance were identified.

9. Bioassay

Section 4.2.b of the licensee's Health and Safety Manual, developed pursuant to Technical Specification 7.1.4, requires that annual bioassay samples be taken from radiation workers to determine if any long term buildup of plutonium has occurred.

The inspector reviewed urine data for 1980 for about twelve radiation workers to assure that they were participating and also to determine if there may be problem areas.

No items of noncompliance were identified.

10. Whole Body Count

The licensee is required to perform whole body counts on employees at a stated frequency.

Technical Specification 7.1.4 states, "Detailed written procedures, run sheets, letters of authorization and extended work procedures shall be provided for operation of the plant. In addition, procedures for handling abnormal operating conditions and for radiation protection shall be provided." Item 4.2.C of Section 4, Personnel Monitoring, of the Health and Safety Manual, developed pursuant to the above

states, "Whole body counts are taken on all radiation workers prior to employment, annually thereafter... to verify no significant quantities of fission products are internally deposited."

The inspector selected the names of ten operators to determined if they had been counted during 1980 as required. All had been counted.

No items of noncompliance were identified.

11. Instrument Calibration

Section 5.3 of the Health and Safety Manual, developed pursuant to Section 7.1.4 of the Technical Specifications, describes certain instruments and the requirement that the instruments be calibrated. The inspector reviewed the schedules established for instrument calibration, and selected approximately five portable survey instruments to determine if they had been calibrated at the scheduled frequency during the period July to December 1980.

No items of noncompliance were identified.

12. DOP Test

Technical Specification 6.5.1 requires certain filters be tested (if they are changed) with particulates of appropriate size to establish that the installed filters provide a collection efficiency of 99.95% for particulates 0.3 microns in diameter or larger.

The inspector reviewed appropriate records and noted that absolute filters on one system (8T-1A) had been changed on September 2, 1980. The records also indicated that the system had been DOP Tested on the same date.

No items of noncompliance were identified.

The inspector was informed by the Health and Safety Manager that appropriate employees are also examined yearly to determine if they are psychologically fit to wear respirators.

No items of noncompliance were identified.

13. Posting and Labeling

The inspector reviewed the facility posting against the requirements of 10 CFR 19 and 10 CFR 20, and observed that the licensee was in compliance with the regulations. The inspector also observed that high radiation areas were locked and posted, and radiation areas were posted as required. The entire facility was posted in compliance with the regulations.

No items of noncompliance were identified.

14. Facilities and Equipment

The inspector toured the facilities and examined equipment and instrumentation to verify that the items were available for use and maintained in an operable state. The inspection included examination of continuous air monitors, survey meters, the stack monitor, and area monitors.

No items of noncompliance were identified.

15. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on April 24, 1981. The inspector summarized the purpose and the scope of the inspection and the findings as presented in this report.