

INTERNATIONAL PAPER

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NOVEMBER 3, 1989

Mr. Thomas Thompson
Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Dear Mr. Thompson:

This letter is in reply to the Notice of Violation we received on October 5, 1989 concerning the activities that occurred in the summer of 1989.

Responding to the first item, we admit to the allegations set forth. A nuclear gauge located in the chip silo was moved by an unauthorized employee. The details of this incident have been supplied to your office in a letter dated July 25, 1989 which is attached. The corrective action that was taken to avoid any future incidents has been to intensify the training program that was already in progress. International Paper had committed to training the entire work force in a former incident. Because of this incident the training schedule was accelerated and the entire work force was given a basic review of radiation safety. This was accomplished by having all employees review the attached sheet including a list of all the sources we currently have on site. In addition, a short training film was made for our location and all employees are now required to view this film. All employees have seen this film as of October 15, 1989. The Nuclear Safety Course is now an annual requirement.

In addition to employee training two additional steps were taken. First, the radiation safety procedures sheet was posted near each one of the radiation sources where it can be seen and read. Additionally signs were placed on or very near each one of the applicable sources in the facility. These signs state:

DO NOT MOVE ! ! !

UNLESS LICENSED BY THE N.R.C.

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In response to the second issue, we admit that we were not aware of the reporting requirement for general-licensed nuclear gauges whenever a shutter mechanism malfunctions. Since the last incident, all three RSO'S have been made aware of this section [10 CFR 31.5 (c)(5)] and will report any future incidents regarding general licensed gauges to your office.

In response to the second issue in the Notice of Deviation, we would like to refer to the letter sent to your office dated August 17, 1989. The second issue regards the same subject addressed in the letter of deviation - the indicator lights on the locking mechanisms. As stated in the previous letter, which is attached, we feel our decision to install these lights was a mistake and would like to stop pursuing this issue. Just to reiterate, some of the reasons for this decision are:

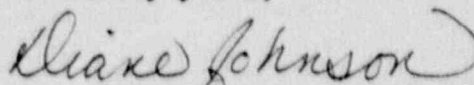
1. The manufacturer of most of the units we utilize has not been cooperative in designing indicator lights for shutter mechanisms.
2. We feel that the additional units would be very high maintenance items and may cause an employee to work around the units more frequently.
3. There may be a higher risk of exposure if one of the lights did malfunction and the employee had a false sense of security.
4. At the time the decision was made, the RSO'S did not have the training which would have pointed out these deficiencies in this plan; however, that has been corrected and a team of RSO'S has been formed to assure compliance and the RSO'S requirements will include periodic refresher training.

As an alternative corrective action, we have intensified our training program as previously discussed on page 1.

If we do not here from you, we will not pursue this issue any further.

If you have any other questions or concerns please contact us. Thank you.

Sincerely yours,



DIANE JOHNSON
LOU ORTIZ

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