

October 11, 1989

 **TELEDYNE
ISOTOPES**

50 VAN BUREN AVENUE

WESTWOOD, NEW JERSEY 07675

(201) 664-7070

John D. Kinneman, Chief
US Nuclear Regulatory Commission, Region I
Nuclear Materials Safety Section B
475 Allendale Road
King of Prussia, Pennsylvania 19406

RE: Notice of Non-compliance dated September 11, 1989 &
the Combined Inspection of License Nos. 29-00055-02,
29-00055-06, 29-00055-14, 29-00055-15, SUB-1235, &
SNM-107 dated July 1988

Dear Mr. Kinneman:

In response to your letter of September 11, 1989, Teledyne Isotopes submits the following information:

Violation: "Condition 17 of License No. 29-00055-06 requires that we conduct a physical inventory of all sources and/or devices..."

Response: We were unaware that the Commission required us to physically inventory sources that were less than or equal to 10 microcuries of alpha emitting material and less than or equal to 100 microcuries of beta and/or gamma emitting material. We had assumed that since these sources are exempt under most conditions that they would also be exempt under this provision. We realize that we were in error and will include these sources from now on.

We have performed an inventory of all sources which were unidentified. Therefore, we are currently in full compliance of this inventory provision.

In order to prevent a reoccurrence of this violation, we developed a computer program that sorts the sources by license and license condition. By sorting in this manner we found an apparent violation. Condition L of the 29-00055-06 license specifies Am-241, total of 1 Curie. We found we had eight sources totaling 1.142 Curies. We will bring this item into compliance as soon as we can obtain approval for burial at the Hanford facility. We expect we will be in full compliance by December 31, 1989.

In your letter you also requested an update of our progress on the items noted during the inspection of July 1988. The following update is provided:

Recommendation 9.1.1: Additional manpower and expertise to be devoted to fire protection and industrial safety.

Response: We had a Fire Protection professional visit our facility. We had planned on utilizing college programs in industrial hygiene and work study programs to supplement our current industrial safety program but we cannot locate anyone. In addition, Jeffrey Guenther, our alternate RSO has resigned and we are in the process of trying to replace him. We will look for someone with some industrial hygiene training as well as radiation safety knowledge and experience.

Recommendation 9.1.2: Assuring that safety related work is performed in a timely manner.

Response: We hired an additional employee for the maintenance staff.

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Recommendation 9.2.1: Limit the storage of combustibles and provide safety cans with flame arrestors.

Response: We have reviewed our purchasing procedures of flammable and combustible materials and limit the amount purchased at any one time. We have purchased approved storage cans for use with flammable liquids.

Recommendation 9.2.2: (1) Modify controls of PM furnace door controls. (2) Provide automatic cutoff switch for water jacket to RF generator. (3) Assure gloves are not drawn into the glove box. (4) Consider a fire suppression system for the glove box.

Response: (1) We have added a hook to hold the control in the closed position. (2) We have contacted the manufacturer of the RF generator and will install an automatic cutoff in the water feed to the water jacket of the glove box. (3) Gloves will be withdrawn and tied when not in use in areas where a fire hazard exists. (4) When the system was designed a fire suppression system was discussed and it was determined then that it is undesirable. The glove box has a limited amount of combustible in it at any one time. The only sources of ignition are the furnace and a few electrical outlets. The furnace exhaust goes through a scrubber system which would keep any exhausted fire from starting the HEPA filters on fire. The electrical outlets are rarely used and only when someone is present. No items are left 'plugged in', 'ON', and unattended.

Recommendation 9.2.3: Improve fire barriers, fire doors, and fire dampers in ductwork if needed.

Response: We have installed fire doors.

Recommendation 9.2.4: Assure that the fire detection system complies with NFPA guidance.

Response: The NFPA recommends total coverage. As this was not within our budget this past year, we have covered the most likely areas with detectors. We plan on providing total coverage of all areas some time next year.

Recommendation 9.2.5: Improve general employee training in fire prevention.

Response: The county fire prevention bureau has available videos for this purpose. The fire brigade recently held a fire extinguisher training program where the video "Fight or Flight" was shown and was followed by a demonstration by the local Fire Prevention Bureau. We are hoping to do this annually.

Recommendation 9.2.6: Make expertise in fire safety available to the Fire Safety Officer.

Response: See item 9.1.1.

Recommendation 9.2.7: Review the impact of the low flash point roofing material.

Response: The material has a flashpoint of 500 degrees F.

Recommendation 9.2.8: Install sleeves around chimneys from gas water heaters and install gas monitors in areas where gas water heaters and other gas-related equipment is installed.

Response: This item has been completed.

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Recommendation 9.2.9: Repair gaps in the walls and door of the waste compactor building.

Response: This item has been completed.

Recommendation 9.3.1: Establish a facility-wide policy for operating procedures.

Response: We have discussed this at length and have decided that it would be a monumental task to accomplish this recommendation. However, what we plan to do is have a Safety Review of all operating procedures.

Recommendation 9.3.2: Establish operating and safety procedures for the maintenance area and the machine shop.

Response: We have implemented standard machine and carpentry safety procedures.

Recommendation 9.4.1: Index all branch distribution boxes so that all circuit breakers are identified.

Response: This item is 90 percent completed.

Recommendation 9.4.2: Mark each light switch and receptacle with its associated circuit breaker.

Response: This item is 90 percent completed.

Recommendation 9.4.3: Arrange electrical cables in loft in trays or conduit. Mark cables for identification and assure compliance with the latest applicable codes.

Response: We contacted OSHA and there are no standards that necessitate the use of trays or conduits for cable runs at our facility.

Recommendation 9.4.4: Review all electric equipment in use at the facility to assure that it is grounded and meets applicable codes.

Response: This item has been completed.

Recommendation 9.4.5: Request that the electric utility trim the branches of the tree which is touching the incoming power lines to the warehouse and remove vegetation from the transformer area behind the main building.

Response: This item has been completed.

Recommendation 9.5.1: Review storage of combustibles. Arrange storage of all materials so that manipulating the materials will not create a hazard for workers. Flammable liquids are to be stored in approved safety containers.

Response: As we do not have any current locations which could be considered 'fireproof' we are reviewing the storage locations to put the materials in the best possible locations. We will replace all the wooden shelving with six foot high metal shelves. See item 9.2.1. To date we have replaced all of the wooden shelving in the Sample Receipt Room which had the largest fire load. As time and budget allow, we will eventually replace all wooden shelves with metal.

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Recommendation 9.5.2: Cylinders of compressed oxidizing and reducing gases must be stored apart. All compressed gases must be supported in a way that will prevent their being tipped over.

Response: This item has been completed.

Recommendation 9.5.3: Correct the ventilation of the chemical storage closet in the HP lab.

Response: This item has been completed.

Recommendation 9.6.1: Perform surveys of the radio-frequency radiation fields in the precious metals and mass spectrometry areas to assure that they are within the applicable limits.

Response: This item has been completed.

Recommendation 9.7.1: Install check valves in the water pipes where the municipal water supply enters the facility.

Response: We are arranging for this to be done. There is no tentative schedule for completion.

Recommendation 9.7.2: Assure that the traps in the floor drains are always filled, or cap drains.

Response: We have capped the floor drains in question.

Recommendation 9.8.1: Inspect all piping and other equipment associated with the liquid nitrogen system.

Response: This item has been completed.

Recommendation 9.8.2: Equip the liquid nitrogen filling hose with a plug when not in use, and support it so that it does not rest on the floor.

Response: This item has been completed.

Recommendation 9.9.1: Install a cage on the ladder leading to the roof.

Response: 29CFR1910.27(d)(ii) states that cages shall be provided on ladders of more than 20 feet. The ladder in question is only 18 feet from the ground and therefore we feel this item should be disregarded.

Recommendation 9.9.2: Replace wood supports for gas piping with new supports.

Response: This item has been completed.

Recommendation 9.10.1: Assure breathing air used in respirators meets the requirements for CGA Grade D or better, and that the quality of the air is tested periodically.

Response: This item has been completed. The air has been tested and will be set up for re-testing annually.

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Recommendation 9.11.1: Relocate warning lights to the instrument calibration range to eye level and provide a sign indicating the light's significance.

Response: This item has been completed.

Recommendation 9.12.1: Install a guard on the radial arm saw in the carpentry shop.

Response: This item has been completed.

Recommendation 9.13.1: Negotiate a letter of agreement with a local hospital for the provision of medical care for injured, contaminated employees.

Response: We will investigate the feasibility of this item.

If you require further information, or require a follow-up report at sometime in the future, please do not hesitate to contact the undersigned.

Sincerely,

TELEDYNE ISOTOPES

A handwritten signature in dark ink, appearing to read "S. A. Black", written over a horizontal line.

Steven A. Black, R.S.O.
Manager, Radiological Services Dept.

SAB:jk

**TELEDYNE
ISOTOPES**

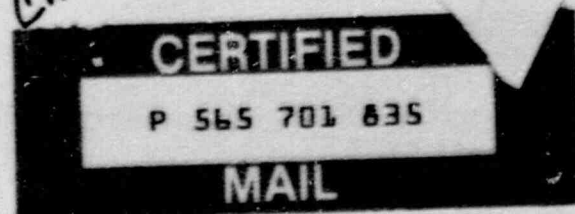
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Charlie G.



**RETURN RECEIPT
REQUESTED**

