# UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

#### ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judge Peter B. Bloch

In the Matter of			
THE CURATORS OF THE UNIVERSITY OF MISSOURI	) Docket Nos.	70-00270-MLA 30-02278-MLA	
(Byproduct License No. 24-00513-32;	Re: TRUMP-S Project		
Special Nuclear Materials License No. SNM-247)	ASLBP No. 90-613-02-MLA		

## DECLARATION OF KAY DREY

- My name is Kay Drey. I am a member of the Missouri Coalition for the Environment.
- On September 29, 1990, I spoke to Mr. J. G. Steppen, MURR consultant, by telephone. Mr. Steppen reaffirmed the recommendation he had made to the University respecting the HEPA filter.
- 3. I read to Mr. Steppen the following excerpt from Judge Bloch's memorandum filed September 7, 1990, of a telephone conference call of August 21, 1990, quoting counsel for the applicant: "Mr. Steppen may not have fully understood the type of glove box arrangement he was consulting on." Mr. Steppen responded, "I would have a little problem with that sentence. . . . I have been involved with . . . designed with . . . lab areas, production areas . . . we've had

that type of glove box." When asked whether he was familiar with the type of glove boxes at MURR, he responded "yes." He stated "It's a little outdated for what they're using it for, but it's operational." He said he has worked with this type of glove box. "I've been working with glove boxes for 31 years." He stated that he has changed or overseen the changing of hunareds of HEPA filters.

- 4. Mr. Steppen expressed great concern that "they had the glove box system dumping into the same exhaust system" as the room exhaust, and "they join the room exhaust and the glove box exhaust" prior to the HEPA filters, so that if there was something that caused a reversal of flow, it could go into the room air.
- 5. Mr. Steppen stated that the requirement he was talking about "would [emphasized] be a requirement for a government installation. . . . There's a government . . . booklet that's put out by DOE." When asked whether this might be DOE Order No. 6430.1A, he responded, "That could be it; I'm not familiar with the numbers." When I suggested that equally strict standards should be observed at MURR, where students will be participating, he agreed.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge and belief.

Kay Drey

Executed at St. Louis, Missouri, this 19 day of October, 1990.

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Before Administrative Judge Peter B. Bloch

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THE CURATORS OF THE UNIVERSITY OF MISSOURI	Docket Nos.	70-00270-MLA 30-02278-MLA	
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Special Nuclear Materials License No. SNM-247)	ASLBP No. 90-613-02-MLA		

# **DECLARATION OF KAY DREY**

- 1. My name is Kay Drey. I am a member of the Missouri Coalition for the Environment.
- 2. On September 16, 1990, I spoke to Mr. Joseph Goldfield, an engineering consultant of Denver, Colorado, by telephone. Mr. Goldfield told me the following:

He is a licensed professional engineer in four states. He sent me a brochure which is attached hereto, summarizing his experience and qualifications. He worked on making the first HEPA filters, in 1945 and 1946. He has written a paper on HEPA filters in the nuclear industry, a copy of which is attached.

All HEPA filters should be installed where they can be DOP tested. You cannot take credit for the efficiency of a HEPA filter that can't be DOP tested

after installation... because it can be damaged so easily during installation. The HEPA filters can't take very high temperatures. He also asked a rhetorical question: If the plutonium gets into the room, how do they prevent it from getting outdoors?

I declare under penalty of perjury that the above is true and correct to the best of my knowledge and belief.

Kay Drey

Executed at St. Louis, Missouri, this 17 day of October, 1990.

#### CERTIFICATE OF SERVICE

of October, 1990, by first class mail, postage prepaid, to:

The Honorable Peter B. Bloch DOCKETING & SECRETARY Administrative Law Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

LUCKLIED

The Honorable Gustave A. Linenberger, Jr. Administrative Law Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, DC 20555

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