

Specialty Chemicals Group
Portsmouth Plant
Hoechst Celanese Corporation
3340 West Norfolk Road
Portsmouth, VA 23703
804 483 7000
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November 29, 1990

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Re: Reply to a Notice of Violation
(NRC Inspection Report No. 45-19889-01/90-01)
Hoechst Celanese Corporation
Portsmouth, Virginia

Dear Sir:

This letter is written in response to your letter of November 5, 1990 regarding your October 5, 1990 inspection and informing us of three alleged violations of requirements contained in this facility's NRC Material License No. 45-19889-01.

- A. License Condition 11 requires the licensee to ensure that no individual, other than the individuals named in Condition 11, use or supervise the use of the license material.


Hoechst Celanese has had a number of organizational changes since July, 1990. Due to either promotions, retirements, relocations, or terminations, our records were outdated. Attached is a copy of a letter to Ms. Diane Hein, NRC, requesting our material license to be amended to delete personnel no longer with the company. Ethel Tatum and William Wade are now the responsible personnel for radioactive sources. A written Radiation Safety Management System is being developed and will be implemented by December 21, 1990 to assure on going compliance. Full compliance will be achieved pending a response from NRC.

- B. License Condition 15 requires the licensee to possess and use its licensed material in accordance with statements, representations, and procedures contained in license applications dated October 14, 1981 and December 2, 1981, and letters dated October 14, 1981, December 2, 1981, February 13, 1987 and October 10, 1988.

The letter dated February 13, 1987, included procedures which required that devices located outdoors be covered by plexiglass to assure protection against corrosive materials.

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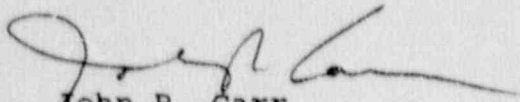
Due to equipment repairs/modifications, the plexiglass covers were inadvertently removed. Plexiglass covers have been fabricated and installed on the two devices located outdoors. In the future, the replacement of the plexiglass covers after repairs/modifications will be immediate. Full compliance was achieved on November 19, 1990.

- C. License Condition 12 requires the licensee to test each sealed source contained in Ohmart or Texas Nuclear devices for leakage and/or contamination at intervals not to exceed six months, except sources authorized by the Commission (or an Agreement State) may be tested at intervals not to exceed three years. The devices that the licensee possessed which were manufactured by Ohmart Corporation are authorized by Ohmart's NRC license to be leak tested at intervals not to exceed three years.

As a result of the previously mentioned organizational changes, device testing was overlooked. A representative from Ohmart Corporation was on site on October 19; at that time, leak tests, shutter tests, and condition checks were made on all ten sources. In addition, a survey was performed on the density meter in the Amines Plant. In order to avoid further violations, leak testing will become a part of Hoechst Celanese's preventative maintenance program. Full compliance was achieved on October 19, 1990.

In light of the above responses and collective actions, Hoechst Celanese contends that no further NRC enforcement action is necessary. Any further questions need to be directed to Ethel Tatum at 804-483-7206.

Sincerely,



John R. Carr
Plant Manager

JRC/sj

cc: U. S. Nuclear Regulatory Commission
Regional Administrator, Region II