



PHILLIPS PETROLEUM COMPANY

BARTLESVILLE, OKLAHOMA 74004

RESEARCH AND DEVELOPMENT

January 4, 1994

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Subject: Reply to Notice of Violation NRC Inspection Report 030-05897/93-01

Dear Sir:

This letter is written in response to NRC Inspection Report 030-05897/93-01 dated December 15, 1993. An inspection of the Phillips Research Center on November 19, 1993, identified several items pertaining to the PRC license agreement which the inspector felt needed attention or correction. We are providing this outline of the steps we are taking to address all of the concerns described in your December 15 letter and the accompanying the Notice of Violation.

The Notice of Violation appended to your letter indicated that the waste storage area must be surveyed monthly. Survey responsibility currently rests on members of the PRC Safety and Health Branch. Reassignment of the individual who conducted surveys in the past resulted in a void left in the survey program. Miscommunication between this individual and members of the PRC Safety and Health Branch resulted in a less than regular inspection schedule. The monthly surveying of the waste storage area resumed on November 23, 1993. Reassignment of survey responsibilities will prevent these inspections from getting off schedule in the future. As indicated on the survey form, achievement of full compliance occurred on November 23, 1993.

Issues relating to the PRC Radiation Safety Program arose during the inspection. The first issue involves record keeping associated with the quarterly Radiation Safety Committee meetings. The Radiation Safety Committee meets quarterly, but Phillips was unable to produce the minutes from one meeting at the time of the inspection. The Occupational Health and Lab Safety Subcommittee of the Safety Steering Committee agree minutes are necessary and should be maintained to document information discussed and provide a resource for future considerations. To help assure the minutes are regularly kept and more easily accessible, the PRC Radiation Safety Committee will maintain a log identifying meeting dates and assign the responsibility as scribe to a Committee member.

The second issue involves the PRC radiation monitoring program. The individual assigned duties of leak testing sealed sources, and conducting radiation surveys and inventories was not included in the monitoring program in

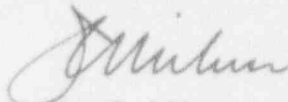
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the past. As you recognize in your December 15 letter, this individual is unlikely to receive an external radiation dose in excess of 25 percent of the annual occupational dose limits specified in 10 CFR 20.101(a). Nevertheless, in an effort to maintain a proactive Radiation Safety Program, this individual entered the monitoring program on November 21, 1993.

If you have any questions, please contact me or Doug Lemons (RSO) at 918-661-3281.

Sincerely,



John C. Mihm
Vice President, Research & Development

JCM:dkp:dhl94-1

cc: Regional Administrator, Region IV

J. W. Hoffman

D. H. Lemons