

June 25, 1982

License SNM-1067
Docket 70-1100

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Thomas T. Martin, Director
Division of Engineering & Technical Programs

Reference: Letter from Thomas T. Martin, NRC, to H. V. Lichtenberger, C-E
dated June 8, 1982; Inspection No. 70-1100/82-02

Dear Mr. Martin:

This is in response to the above referenced letter in which you reported two items of non-compliance which were determined during your inspector's visit to our facility on February 24-26, 1982.

Appendix A - Item A

Condition 15 of License No. SNM-1067 requires that each encapsulated plutonium source be tested for leakage at intervals not to exceed six months.

Contrary to the above, the encapsulated plutonium sources were not tested for leakage in February 1980 and February and October 1981 which was in excess of the six month maximum interval.

Response

The individual assigned the responsibility for leak testing the sources was out sick during the latter part of 1980. Consequently, since no one else was assigned the responsibility, the sources were not checked as required. To prevent a recurrence, source leak testing has been included as part of a master check list which requires audits on items, such as sources, to be completed regardless of who is assigned the responsibility.

Appendix A - Item B

Section 8.2 of License No. SNM-1067 requires that procedures be developed and adhered to. Procedure 15 of the Health Physics & Safety Procedures Manual, developed pursuant to Section 8.2 of License No. SNM-1067, requires a Radiation Work Permit for non-routine maintenance or repair operations on equipment in contaminated areas.

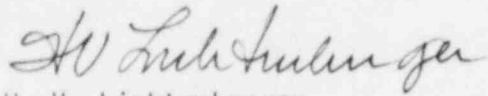
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Contrary to the above, on February 24, 1982, an operator was performing a non-routine enrichment clean-up operation in the recycle hood, a contaminated area, in the uranium manufacturing area and no radiation permit had been issued.

Response

We agree that the Radiation Work Permit had not been completed by the health physics technician, nor signed by the operator prior to the start of work, but the operator was wearing appropriate protective clothing and a breathing zone air sampler, both of which had been specified by the health physics technician. In addition, the health physics technician was present in the area where the operation was being performed. We contend, and your inspector concurred, that monitoring was more than adequate for the conditions under which the operator was working. In the future, work will not start until the Radiation Work Permit has been properly prepared and issued in accordance with procedure requirements.

Very truly yours,



H. V. Lichtenberger
Vice President-Nuclear Fuel
Nuclear Power Systems-Manufacturing

HVL/RES/ssb