30-5802

RMI Company
Extrusion Plant
ATTN: M. R. Schaeffer
Plant Manager
P.O. Box 579
Ashtabula, OH 44004

License No. SN#-602 License No. 34-10618-01

## Gentlemen:

This refers to the routine safety inspection conducted by Messrs. W. J. Slawinski and D. J. Sreniawski of this office on September 30 and October 1, 1982, of activities at RMI Company Extrusion Plant authorized by NRC Source Material License No. SNM-602 and Byproduct Material License No. 34-10618-01 and to the discussion of our findings with you and F. G. Van Loocke at the conclusion of the inspection.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of a selective examination of procedures and representative records, observations, independent measurements, and interviews with personnel.

The independent measurements made by the NRC representatives included direct radiation surveys with an alpha survey instrument and wipe surveys for removable contamination. These surveys were taken in various plant production, locker, and lunch room areas. Direct survey readings in the production area were within the decontamination action level prescribed in your license. One floor area in your lunch room slightly exceeded your decontamination action level. However, this direct survey was performed prior to your daily lunch room clean up. The wipe surveys were analyzed in the NRC Region III laboratory and showed all production area transferable contamination levels to be less then the action levels prescribed by your license. One lunch room floor area exceeded your transferable contamination action level. However, these wipe surveys were also performed prior to your daily level room decontamination.

Soil samples were taken at various locations outside your production building but within the restricted areas. Water and sediment samples were taken at various locations in and around Fields Brook to check for the pressure of offsite contamination. These samples were split with your representative for comparison. Analyses of NRC samples were performed by Argonne National Laboratory and are presented in attachment I. The uranium was chemically separated from each sample and concentrations of the individual uranium isotopes determined by alpha spectrometry.

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The water samples (Nos. 562-566) showed a maximum of 54.9 pCi/L of U-238. The maximum permissible concentrations under Title 10, Code of Federal Regulations Part 20.106, Appendix B, Table II is 40,000 pCi/L of U-238. The sediment/soil samples (Nos. 557-560) showed a maximum of 887 pCi/gm U-238 and 418 pCi/gm U-234 present in the sediment near the base of your discharge pipe. This is greater than the U.S. Environmental Protection Agency soil limits established for release of such areas for unrestricted use. However, this sediment sample was taken within your fenced restricted area boundary. Also, there is no specific limit or guideline recommended for radioactivity in sediments. The pathway leading to the greatest exposure from uranium in soil is thru inhalation or breathing. This is very unlikely to occur for sediment which is located under water.

Because the concentrations at all locations other than the sediment directly beneath the discharge pipe were relatively low, these results do not indicate that a significant health and safety problem exits.

In addition to the above areas, the inspectors examined actions described in your letter dated February 5, 1980, regarding apparent items of noncompliance found during our January 8 and 9, 1980 inspection. We have no further questions regarding these matters.

No items of noncompliance with NRC requirements were identified during the course of this inspection of License No. 34-10618-01.

However, during the inspection of License No. SMB-602, certain of your activities appeared to be in noncompliance with NRC requirements, as specified in the enclosed Appendix. A written response is required.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and response to this letter will be placed in the NRC's Public Document Ro a. "f this report contains any information that you (or your contractors) we to be exempt from disclosure under 10 CFR 9.5(a)(4), it is note at you (a) notify this office by telephone within ten (10) days ... late of this letter of your intention to file a request for withwolding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven (7) days are available for your review. please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought

to be withheld shall be incorporated as far as possible into a separate part of the affidevit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

The responses directed by this letter (and the accompanying Notice) are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

D. J. Sreniawski, Chief

Materials Radiation Protection

Section 2

Enclosure: Appendix, Notice of Violation

cc w/encl:

DMB/Document Control Desk (RIDS)

Slawinski/jo Sren 12/3/82