

UNITED STATES

WASHINGTON, D.C. 20555-0001

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Docket 70-36 License SNM-33

MEMORANDUM FOR: Robert C. Pierson, Chief Licensing Branch Division of Fuel Cycle Safety and Safeguards, NMSS

THRU: Michael Tokar, Section Leader Licensing Section 2 Licensing Branch Division of Fuel Cycle Safety and Safeguards, NMSS

FROM:

Marc Klasky Licensing Section 2 Licensing Branch Division of Fuel Cycle Safety and Safeguards, NMSS

Sean Soong Licensing Section 2 Licensing Branch Division of Fuel Cycle Safety and Safeguards, NMSS

SUBJECT: MEETING WITH COMBUSTION ENGINEERING, INC. (CE), RE LICENSE RENEWAL APPLICATION

On February 10, 1994, Combustion Engineering, Inc. (CE) representatives met with the staff of the Office of Nuclear Material Safety and Safeguards to discuss radiation and criticality safety issues related to CE's revised license renewal application. During the meeting, NRC staff identified several items that should be incorporated into the renewal application and expressed concern about the quality of the revised application. The staff pointed out that the inadequate safety demonstration in radiation safety indicates the need for complete technical review and evaluations by CE prior to submitting a revised application. The following major items were discussed during the meeting:

A. Radiation Safety Area

 The survey frequency for measuring the airborne concentration of radioactivity in the workers' breathing zone air should be consistent with Table 1 of Regulatory Guide 8.24.

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Robert C. Pierson

- The bioassay program should include the appropriate frequency and types of measurements for monitoring worker's intake of soluble and insoluble uranium.
- 3. CE should establish the action to be taken when the workers' intake of radioactive material exceed the preset action levels. The action levels and action to be taken for intake of both soluble and insoluble uranium should be addressed.
- 4. Specify an annual frequency for calibrating the air flow meter.
- 5. Describe the detection sensitivity of radiological survey meters.
- Limits for surface contamination should be consistent with Table 2 of Regulatory Guide 8.24. Contaminated radioactive material areas and clean radioactive areas should be clarified.
- 7. Filters should be changed if the differential pressure across the filter exceeds 6 inches of water or at a value recommended by the manufacturer, whichever is lower.
- Operability of the radiation detection devices should be checked at least daily.
- The plant contamination survey should include both alpha and beta/gamma modes.
- Identify the position/function responsible for implementing the safety training program.
- 11. Figures 12-1 and 12-2 should be revised to identify the potentially contaminated areas.
- 12. Update airborne release data and dose commitments in Section 13-1.
- B. Criticality Safety Area

These discussions focused on the means by which CE would provide the basis for safety for individual processes throughout the facility. An agreement was reached whereby CE would define the basis of safety for individual processes by utilizing one of the following methods:

- A commitment to utilize specific control parameter(s) and associated design criteria for a given process,
- 2. A commitment to utilize specific controls for a given process,

Robert C. Pierson

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3. A combination of 1 and 2,

 A commitment to utilize a Single Individual Unit (SIU) and the associated criteria.

It was agreed that CE would incorporate the above items into the renewal application and resubmit it by March 21, 1994.

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Marc Klasky Licensing Section 2 Licensing Branch Division of Fuel Cycle Safety and Safeguards, NMSS

cc: Mr. Robert W. Sharkey, Manager Regulatory Compliance Hematite Nuclear Fuel Manufacturing Combustion Engineering, Inc. P.O. Box 107 Hematite, MO 63047

> Mr. J. F. Conant, Manager Nuclear Materials Licensing Combustion Engineering, Inc. 1000 Prospect Hill Road Windsor. Connecticut 06095-0500

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