



January 24, 1983

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 December 29, 1982; Inspection No. 70-1100/82-11

Dear Mr. Martin:

This is in reply to the above referenced letter in which you reported that as a result of your inspector's visit to our facility on November 15-19, 1982 certain of our activities were not conducted in full compliance with NRC requirements. Our response to the Notice of Violation, identified as Appendix A to your letter, is as follows:

Appendix A - Item A

10 CFR 20.205(b)(1)(i) states that each licensee, upon receipt of a package of radioactive material, shall monitor the external surfaces of the package for radioactive contamination caused by leakage of the radioactive contents, except: (i) Packages containing no more than the exempt quantity specified in the table in this paragraph. The exempt quantity for Transport Group III radionuclides (U-235) is 1 millicurie.

Contrary to the above, from January 19, 1982 through July 27, 1982 only 25% of the Model CE-250-2 shipping containers received were monitored on the external surfaces of the package for radioactive contamination. Each package contained approximately 10 millicuries of U-235 which was in excess of the exempt quantity.

Response

All incoming Model CE-250-2 shipping containers are now being monitored on the external surfaces of the package for radioactive contamination prior to releasing the containers to manufacturing.

Appendix A - Item B1

10 CFR 71.5 prohibits delivery of licensed material to a carrier for transport unless the licensee complies with applicable regulations of the Department of Transportation in 49 CFR Parts 170-189. 49 CFR 173.393(h) requires that there must be no significant removable radioactive surface contamination on the exterior of the package (see paragraph 173.397).

Appendix A - Item B1 (Cont'd)

Contrary to the above, from January 19, 1982 through July 27, 1982 the exterior surface of CE-250-2 containers, delivered to a carrier for transport, was not monitored to assure that there was no significant removable radioactive surface contamination.

Response

The exterior surfaces of all CE-250-2 containers are now being monitored to assure that no significant removable radioactive surface contamination is present. This surface monitoring is being done before the containers are delivered to the carrier for transport off-site.

Appendix A - Item B2

10 CFR 71.5 prohibits delivery of licensed material to a carrier for transport unless the licensee complies with applicable regulations of the Department of Transportation in 49 CFR Parts 170-189. 49 CFR 173.389(i) requires that the transport index to be assigned to a package of radioactive material shall be determined by either paragraph (i)(1) or (2) of this section, whichever is larger. Paragraph (i)(1) "The highest radiation dose rate, in millirem per hour at three feet from any accessible external surface of the package; or (i)(2) For Fissile Class II packages only, the transport index number calculated by dividing the number "50" by the number of similar packages which may be transported together ..., as determined by the procedures prescribed in the regulations of the U. S. Nuclear Regulatory Commission ...". Certificate of Compliance No. 9022 for the Model CE-250-2 packages defines the transport index for Fissile Class II as 0.6.

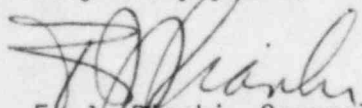
Contrary to the above, from January 19, 1982 through July 27, 1982 the transport index assigned to CE-250-2 containers delivered to a carrier for transport was not the larger of the values determined as required. All CE-250-2 containers were assigned a transport index of 0.6 as indicated by the Certificate of Compliance. However, in 8 instances, the transport index determined from the radiation dose rate at three feet was higher (0.7 to 0.8).

Response

The transport index for CE-250-2 drums will be assigned as follows:

| <u>Beta-Gamma Reading</u> <u>(at 1 meter from drum surface)</u> | <u>Assigned Transport Index</u> |
|--|---------------------------------|
| NDA - 0.64 | 0.6 |
| 0.65 - 0.74 | 0.7 |
| 0.75 - 0.84 | 0.8 |
| 0.85 - 0.94 | 0.9 |

Very truly yours,


F. J. Planki, General Manager
Nuclear Fuel Manufacturing

FJP/ssb