

# Process Technology North Jersey

Subsidiary of RTI Inc.

108 LAKE DENMARK ROAD, ROCKAWAY, NJ 07866  
(201) 625-8400 • FAX: (201) 625-7820

February 26, 1990

Mr. John White, Chief  
Nuclear Materials Safety Section C  
United States Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

License No. 29-13613-02  
Docket No. 030-07022

Dear Mr. White:

In your letter of February 5, 1990 attached to the notice of violation you state "...it appears that your activities were not conducted in full compliance with NRC requirements. We disagree and submit the following information.

Section 3.0 of Mr. Thompsons' report.

First paragraph - "...observed little preparation..." This operation had been the subject of numerous discussions prior to December 18, 1989. On December 4, 1989 a letter was sent to the USNRC region 1 outlining our plan of action and requesting NRC input and comments. Mr. Thompson of the USNRC called us on December 15, 1989 to review our plans. Chem-Nuclear personnel, prior to arriving at our site on December 18, 1989 had visited our site to observe the area and discuss the cutting and had performed a dry run of the cutting operation.

The second paragraph relates to checking the ion exchange bed monitor and the pool radiation monitor. We believe there is no requirement to check either monitor for this operation. As required water samples were taken prior to any actions and indicated no detectable activity.

The licensee had planned to lower equipment into the pool by the use of ropes. The cask liner, the heaviest piece of equipment lowered by rope weighed about 300 pounds. A 125 ton crane was available to lower heavier items.

9004170157

XA

B/68

Regarding the comment that we had not planned for the isolation of the storage pool, this matter was discussed with Mr. Thompson on the phone and on December 15, 1989 a letter was faxed to Mr. Thompson describing a flange cover plate to be used if necessary. This flange cover plate was available before and throughout the entire activity.

Regarding the comment that no provision was made to cover the pool, a cover was in place over the pool as the roof area was modified. It did not prove to be completely adequate and an additional cover was added.

The inspector stated that in cutting the hole in the roof some flammable materials ignited. "Flammable" is defined in our USNRC approved license application dated December 12, 1988, item 6.1 as a material with a flash point below 145 degrees Fahrenheit. There was and is no material meeting the flammable definition in the irradiator area. A small piece of roofing material less than 6 inches in diameter ignited and was immediately extinguished.

Regarding the item cited as violating the requirement that "prior to removal of any material from the shielded volume of the irradiator pool or storage pool that has been in close proximity to sealed sources, a radiation survey shall be conducted", we present the following:

a) Both John Schlecht and Paul Shapiro were observing Chem-Nuclear personnel for compliance to the regulations. Neither one observed the incident cited by Mr. Thompson, nor to our recollection did Mr. Thompson mention this incident at the time that it occurred.

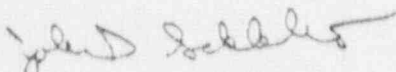
b) When the licensee took the water sample from the pool there were 3 RTI employees, about 3 Chem-Nuclear employees, and 2 NRC employees in the room. There was a survey instrument over the pool and at least 3 others in the area. One of the NRC personnel held a survey instrument in close proximity and surveyed the water sample. The employee doing the sampling observed that a survey was being done and was lead to believe that the requirement was being met.

c) Ropes attached to J-hooks were never in "close proximity" to sealed sources. Since the radiological water samples were negative, there was no requirement that these items be surveyed.

During the exit interview, Mr. Shapiro advised the Inspectors that planning had been performed, including a dry run. He also stated that the licensee is aware and accepts responsibility for all activities. He further stated that Chem-Nuclear had been required to present training documentation for their employees.

RTI employees have been re-instructed orally immediately after receiving the notice of violation and instructed again by memo on Feb 26, 1990 on the proper procedures for source movement. It should be noted that a cobalt source movement is not expected until this spring or early summer. Full compliance has been achieved.

Sincerely,

  
John Schlecht, RSO

enc:

cc: J. Scandalios, P.O. Shapiro, RSO File