

Process Technology North Jersey

Subsidiary of RTI Inc.

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June 11, 1990

Mr. Malcolm R. Knapp, Director
Division of Radiation Safety
and Safeguards
United States
Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Re: Inspection No. 030-07022/90
License No. 29-13613-07

Dear Mr. Knapp:

This is in response to your letter of May 24, 1990 and the Notice of Violation attached. Item 7.5 of Procedure 12.100 states that we record all part replacement on an individual log. The Notice of Violation with your letter of May 24, 1990 states that no record was made of replacements on an individual log. Until the time of the NRC inspection of February 12 and 13, 1990, repairs and replacements were documented in the Shift Supervisors Log. This log is reviewed by the Plant Manager/Radiation Safety Officer. Maintenance items were tracked by the PM/RSO using the Shift Supervisors Log as indicated by the RSO's awareness of the 90 second start-up switch being replaced at short intervals (the RSO stated once a month). (Shielding for this switch was installed in April 1990 and should reduce the changeout frequency.

The violation relates to the use of the shift supervisors log instead of the particular form cited in Procedure 12.100. The Notice of Violation also states that the Manager of Operations did not review and sign the permanent preventive maintenance record on a weekly basis. Parts replacement items were noted in the Shift Supervisors log which was reviewed by the RSO.

The required forms were put into use on February 13, 1990. The RSO or Operations Manager/RSS reviews and signs the PM Log weekly. During the audit Mr. Thompson stated that the RSO, who supervises the operations manager, could review and sign in lieu of the Operations Manager/RSS, thus giving verbal approval to this interpretation of Procedure 12.100. On March 27, 1990 the RSO conducted a training session with the Operators discussing this corrective action. Immediate compliance was achieved.

Process Technology of North Jersey takes exception to this violation being "Severity Level IV". This violation relates to the use of a form other than that specified in the procedure. Namely the use of the Shift Supervisors Log instead of "an

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individual log". It does not relate to the lack of documentation or preventive maintenance, only to not using and signing a specific form. For this reason this would not appear to constitute a "severity level IV" violation under NRC's enforcement policy.

All microswitch changes noted on page 4 of Mr. White's report were not necessarily due to microswitch failures. Microswitches are often replaced when suspected to be the cause of a particular problem. We do not believe that these events support the conclusion that the microswitches generally do not hold up in this irradiation environment.

We disagree with the statement that "the alterations made to the startup procedure on August 13, 1989 were similar to previous unplanned responses...". The alterations made on August 13, 1989 were reviewed and documented by the PM and RSO prior to running the irradiator. This review was performed to ensure regulatory compliance and strict adherence to radiation safety practices. As stated in Mr. White's NRC inspection report, "No violations were identified". This statement could be read to imply that Process Technology of North Jersey Inc. has a "production at all costs" philosophy, which we believe is untrue and not supported in the inspection report or the exit interview.

Very truly yours,



John D. Schlecht
Plant Manager/ Radiation Safety Officer

JDS:jk