

ENCLOSURE 1

NOTICE OF VIOLATION

General Electric Company
Wilmington, NC

Docket No. 70-1113
License No. SNM-1097
EA 90-139

During an NRC inspection conducted on June 18-22, August 1-3, and September 4-6, 1990, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violations are listed below:

- A. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with the requirements of Part 20 and are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

10 CFR 20.401(a) requires each licensee to maintain records in accordance with the instructions contained in NRC Form 5, showing the radiation exposures of all individuals for whom personnel monitoring is required under 10 CFR 20.202. NRC Form 5, Current Occupational External Radiation Exposure, dated October 1981, requires skin exposures to be assessed through a tissue equivalent absorber thickness of 7.0 milligrams per square centimeter (mg/cm²).

Contrary to the above, exposures to the skin of the extremities were not evaluated and recorded in accordance with the instructions contained in NRC Form 5, in that from January 1, 1987 through June 30, 1990, extremity skin exposures to selected workers' hands required to be monitored in accordance with 10 CFR 20.202 were evaluated, and subsequent doses recorded for a tissue equivalent absorber thickness of approximately 57.6 mg/cm² rather than 7.0 mg/cm².

This is a Severity Level IV violation (Supplement IV).

- B. 10 CFR 20.202(a)(1) requires each licensee to supply and to require the use of appropriate monitoring equipment by each individual who enters a restricted area under such circumstances that he receives, or is likely to receive a dose in any calendar quarter in excess of 25 percent of the applicable values specified in 10 CFR 20.101(a).

Contrary to the above, from January 1, 1987 through June 30, 1990, the licensee did not provide and require the use of appropriate extremity monitoring equipment for individuals assigned extremity doses equal to or

exceeding 25 percent of the 18.75 rem quarterly limit specified in 10 CFR 20.101(a).

This is a Severity Level IV violation (Supplement IV).

- C. License Condition No. 9 of SNM License No. 1097 requires that licensed material be used in accordance with statements, representations, and conditions of Part I of the License Application.

Part 1, Section 2.7.1 of the licensee's Application for License No. SNM-1097 requires that radiation protection function activities be conducted in accordance with written procedures.

Contrary to the above, from March 1983 through June 30, 1990, the licensee failed to have approved procedures for conducting evaluations of extremity (hand) dose received by personnel required to handle unclad uranium material.

This is a Severity Level IV violation (Supplement IV).

- D. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with the requirements of Part 20 and are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Process Requirements and Operator Documents (PROD) No. 85.08, Change Room PROD, Personal Survey Leaving Controlled Area, dated December 8, 1986, requires a personal survey for possible contamination on clothing and body, including the feet and ankles, to be conducted by all personnel when leaving the Controlled Area.

Contrary to the above, the licensee failed to conduct adequate surveys or evaluations of the hazards present in that on June 8, 1990, a Uranium Recovery Unit (URU) operator failed to conduct an adequate personal survey (frisk) in that contamination, ranging up to 90,000 disintegrations per minute per probe area (approximately 59 square centimeters), on the bottom and sides of his foot was not detected prior to exiting the radiologically controlled area.

This is a repeat violation.

This is a Severity Level IV violation (Supplement IV).

- E. License Condition No. 9 of SNM License No. 1097 requires that licensed material be used in accordance with statements, representations, and conditions of Part I of the License Application.

Part 1, Section 2.7.1 of the licensee's Application for License No. SNM-1097 requires that radiation protection function activities be conducted in accordance with written procedures.

1. Process Requirements and Operators Document (PROD) No. 85.02, Rev. 4, dated April 22, 1988, requires personnel to wear thermoluminescent dosimetry (TLD) badges at all times while working in the bundle assembly area.

Contrary to the above, the licensee failed to follow procedures in that on June 20, 1990, an individual without a TLD was observed working in the bundle assembly area.

2. PROD No. 85.06, Rev. 6, dated December 13, 1989, requires that "used" respirator should be placed in designated containers or taken back to the laundry.

Contrary to the above, the licensee failed to follow procedures in that, on June 18, 1990, an unbagged or used respirator was noted hanging on the storage rack in the Slab Blender area. On June 19, 1990, the same respirator was again found unbagged, hanging on the storage rack in the Slab Blender areas.

This is a repeat violation.

3. Nuclear Safety Release/Requirement (NSR/R) No. 4.8.6, Storage Pad 6, Rev. 17, dated April 9, 1990, requires that Secondary Nitrate Waste Treatment (SNWT) sludge can array(s) must be roped off and posted "Caution - Radiation Area."

Contrary to the above, the licensee failed to follow procedures for posting areas in that, on June 19, 1990, the SNWT can array in Storage Pad 6B was barriered off with yellow and magenta rope without a "Caution - Radiation Area" sign posted on the usual access point/entrance to the area.

This is a repeat violation.

4. NSR/R No. 4.8.42, Empty Container Storage Area, Revision (Rev.) 1, dated February 20, 1989, requires that combustible material may not be stored or accumulated within 15 feet of UF6 cylinders.

Contrary to the above, the licensee failed to follow procedures in that on June 19, 1990, approximately twelve 2"x4" pieces of wood of varying lengths were noted laying next to the storage area fence within 2 feet of stored UF6 cylinders.

5. NSR/R No. 1.1.26, Empty Can Storage - FMO, Rev. 3, May 11, 1990, requires that empty cans must have a lid and lock ring in place and that empty cans must be free of visible contamination.

Contrary to the above, the licensee failed to follow procedures in that on June 19, 1990, (1) one can in the B&W Blender Area on a conveyor next to the stacker fence did not have a lock ring in place and had visible powder in the bottom, (2) one can located on the conveyor between the two B & W hammermills did not have a lid or lock ring in place, (3) one can in the empty can storage area in the REDCAP area did not have a lid or lock ring in place, and (4) one can located in the 421 (Stacker) Warehouse had no lid or lock ring in place.

This is a repeat violation.

6. PROD No. 85.04, Rev. 8, dated August 16, 1989, requires that workers take extra care to prevent airborne contamination and prevent spread of contamination.

PROD No. 80.96, UO2 Blend System, Control E1, Rev. 17, dated December 12, 1989, requires in the Equipment Operating Instructions that the operator wear a respirator while removing/replacing a used filter bag from the baghouse, place the used bag in a plastic bag taped to the baghouse for the changeout, and handle it so as to limit airborne contamination.

Contrary to the above, the licensee failed to follow procedures for preventing airborne contamination and spread of contamination in that, on June 19, 1990, an operator changing the used filter bag from the Slab Blender baghouse, was observed placing the used bag on the baghouse platform, moving it across the platform with his foot, and then climbing down from the platform, retrieving a plastic bag and finally placing the contaminated bag inside.

This is a repeat violation.

7. Nuclear Safety Instruction (NSI) No. 0-3.0 Sealed Source Control, Rev. 12, dated November 27, 1989, requires the licensee to perform a physical inventory and leak tests of SNM sealed sources at intervals not to exceed three months.

Contrary to the above, the licensee failed to follow procedures in that between the dates of November 1, 1989 through March 15, 1990, a period exceeding three months, four SNM sealed sources were not inventoried nor leak tested.

Violation E, examples 1 through 7, is categorized as a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, General Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be

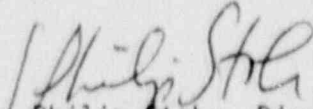
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clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION


J. Philip Stohr, Director
Division of Radiation Safety
and Safeguards

Dated at Atlanta, Georgia
this 2nd day of Nov. 1990