

NOV 16 1990

Docket Nos. 030-04624
040-08806

License Nos. 20-02729-05
SUB-1410

Textron Defense Systems
ATTN: Mr. H. McCard
President
201 Lowell Street
Wilmington, Massachusetts, 01887

Gentlemen:

Subject: Routine Inspection No. 90-001

On August 28 and 29, 1990, C. T. Oberg and C. J. Eckert of this office conducted a routine safety inspection at the above address of activities authorized by the above listed NRC licenses. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. The findings of the inspection were discussed with Mr. Tamin, Mr. J. Pinjarco and Mr. M. Cronan, Jr. at the conclusion of the inspection. This also refers to a telephone discussion between Mr. Tamin and me on November 13, 1990.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed as Appendix A and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

As I explained during the telephone conversation with the Mr. Tamin on November 11, 1990, we are especially concerned that your Radiation Safety Officer does not appear to take an active role in this administration and implementation of your radiation safety program. Mr. Pinjarco of your staff indicated to Mr. Costello of my staff that you plan to request that your license be amended to change the designated Radiation Safety Officer. In your reply to this letter please confirm you plan to request this amendment and discuss the role of your Radiation Safety Officer in assuring that the violations identified in this inspection are corrected and describe any other actions to strengthen your radiation safety program.

Items A, and C in the Notice of Violation enclosed with this letter were identified during a previous inspection of your licensed program and documented in a Notice of Violation enclosed with our letter dated May 10, 1988. From

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this inspection it appears that your corrective actions were not effective since these items have recurred. Recurrent and uncorrected violations are given additional weight in the consideration and selection of appropriate enforcement action. Therefore, in your response to this letter, you should give particular attention to those actions taken or planned to ensure that identified items of noncompliance will be completely corrected and will not recur.

In addition to our concerns for corrective action with respect to the specific violations identified in Appendix A, we are concerned that Item C appears to also be a Deviation from a commitment made in your letter signed by Mr. Mark D. Cronan, Jr., dated June 8, 1988. This letter was written in response to our letter dated May 10, 1988 which described the results of a April 1988 inspection. Specifically, you stated that a representative from Nuclear Metals, Inc., (NMI) will perform contamination and radiation surveys in the DU plating area and that an agreement will be reached between you and NMI personnel on what surveys are to be made and what written reports will be submitted to you for your records. To date, with the exception of a report from NMI dated August 29, 1988, of a radiological safety survey conducted by NMI personnel on August 3, 1988, no other written report is available. In your response to this letter, please provide your comments on this Deviation from your prior commitment.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

John D. Kinneman

John D. Kinneman, Chief
Nuclear Materials Safety Section B
Division of Radiation Safety
and Safeguards

Enclosure:

Appendix A, Notice of Violation

cc
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
State of Massachusetts
A. W. Milton, Radiation Safety Officer
M. D. Cronan, Jr.

bcc:
Region I Docket Room (w/concurrences)
Management Assistant, DRMA
C. T. Oberg
C. J. Eckert

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