

# GENERAL ELECTRIC

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NUCLEAR ENERGY  
PRODUCTS DIVISION

WILMINGTON MANUFACTURING  
DEPARTMENT

September 14, 1982

Mr. John A. Olshinski, Director  
Division of Engineering & Technical Programs  
U. S. Nuclear Regulatory Commission, RII  
101 Marietta Street, NW - Suite 3100  
Atlanta, Georgia 30303

*Docket*

Dear Mr. Olshinski:

References: (1) NRC License SNM-1097, Docket 70-1113  
(2) NRC Inspection Report 70-1113/82-16  
dated 8/20/82, received 8/30/82

Thank you very much for your letter reporting the results of the inspection conducted at our licensed fuel fabrication plant by Mr. C. M. Hosey of your office on July 26-30 and August 3-4, 1982.

Pertaining to the item of apparent noncompliance with NRC requirements in your letter, the reply to this item is given in the attachment to this letter.

We appreciate your inspector's comments and suggestions related to our employee safety and environmental protection programs. These comments and suggestions are helpful to us in our constant efforts to improve these programs, ensure the continued health and safety of plant personnel, and ensure our compliance with NRC regulations and license condition. We also welcome further discussion with your staff on the items in your letter and in our related reply, if necessary, for further clarification of these items.

Your inspection report referred to above does not contain information which we believe to be proprietary.

GENERAL ELECTRIC COMPANY

*Charles M. Vaughan*

Charles M. Vaughan, Manager  
Licensing & Nuclear Materials Management  
M/C J26

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ATTACHMENT

The information given below refers to the item in Appendix A, "Notice of Violation," in the NRC Inspection Report 70-1113/82-16, dated 8/20/82.

License Condition 14 of the license requires that materials and equipment released from restricted areas meet the contamination limits specified in Annex C to the license. Annex C requires that the maximum amount of removable alpha radioactivity in disintegrations per minute per one hundred square centimeters not exceed 1000.

Contrary to the above, the requirements of the license condition were not met in that on July 25, 1982, several pieces of used pipe were released from the restricted area with removable alpha radioactivity levels in excess of 1000 disintegrations per minute per 100 square centimeters. The maximum contamination level was approximately 9,000 disintegrations per minute per 100 square centimeters.

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

General Electric concurs with the inspection finding that on July 25, 1982, the inspector identified several pieces of contaminated piping which had been released from the restricted area to the contractors area within the fenced boundaries of the plant.

The violation appears to have resulted from either the malfunctioning of survey equipment or inadequate survey techniques applied by the radiation protection technician when the piping was surveyed prior to release. This survey was conducted during a day of inclement weather which may have affected the survey equipment's response.

To assure no other contaminated items had been removed from the restricted area:

- o All other items in the dumpster (where the contaminated piping was found) were surveyed and no contamination was found.

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- o Several thousand items in the contractors work area were surveyed and no items were found with contamination levels above the plant's release limits.
- o Several thousand items in the vendor salvage yards were surveyed by NRC, GE and State of North Carolina personnel, and no contaminated items from WMD were found.

In order to avoid future violations of this nature, GE-WMD management has identified the following corrective steps:

- o "Roundtable" meetings between supervision and all radiation protection technicians have already been conducted to re-emphasize the importance of using proper survey techniques.
- o Internal procedures and technical information used by the radiation protection technicians for survey techniques, release criteria and swipe requirements are in the process of being reviewed and completion date for this activity is October 8, 1982.
- o New surveying equipment (micro "R" meters) have been ordered which, we believe, will improve our surveying program by providing a more sensitive state-of-the-art survey meter.

General Electric believes that full compliance as defined by the above items will be achieved by December 3, 1982.

As required in Appendix A of the inspection report, information contained in the response is provided under oath as follows:

The foregoing is true to the best of my knowledge and belief based on the information available to me at this time.

Signed: C. M. Vaughan  
Date: 9/14/82

C. M. Vaughan  
:bsd