GE Nuclear Energy

Nusieal Fuel & Components Manufasturing

January 2, 1991

US Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

REPLACEMENT PAGE FOR REPLY TO NOTICE OF VIOLATION DATED Subject: 12/21/90

- References: 1) NRC License SNM-1097, Docket 70-1113
  - 2) NRC Inspection Report 70-1113/90-07 dated 8/20/90 3) Enforcement Conference Meeting at NRC Region II, August 27, 1990
  - 4' Time Extension to 12/21/90 for Reply to a Notice of Violation, telecon G. Troup and TP Winslow on 11/16/90
  - 5) Enforcement Conference Meeting Summary dated November 2, 1990
  - 6) NRC Notics of Violation (NRC Supplemental Inspection Report 70-1113/90-07) dated November 2, 1990
  - 7) Letter dated July 20,1990, "Determining Compliance With the Occupational Dose Limits in 10 CFR
  - 20.101", LJ Cunningham to MR Knapp et al. 8) Letter, TP Winslow to Document Control Desk, 12/21/90

In our December 21, 1990, reply to NRC Notice of Violation, dated 11/2/90, for inspection 70-1113/90-07 we inadvertently submitted a section that was a part of an earlier internal draft and, therefore, requires the correct wording to be submitted for replacement.

On page 13 of Attachment 1 of our 12/21/90 letter, the wording in the 3rd paragraph starting with "Initiation of ... " needs to be replaced with the final commitment wording provided in the attached page.

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We believe that the commitment as stated in the corrected wording provides the appropriate reviews of our radiation protection program.

Please contact me at (919) 675-5461 if you have any questions or would like to discuss the matter further.

Very truly yours,

GE NUCLEAR ENERGY

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T. Preston Winslow, Manager Licensing & Nuclear Materials Management

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Attachment

cc: Stewart D. Ebneter Region II TFW-91-002

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the effectiveness of ongoing corrective actions, measure progress, and determine the need for additional corrective measures. This assessment activity will be continued as long as it is needed and effective in assuring procedural compliance. Guidelines for these assessment personnel to perform their needed function will be documented.

- Contracted independent, specifically trained personnel in high trafficked changerooms during end-of-shift peak use times, to observe personal survey activities and enforce the use of proper survey techniques. This activity will be continued as long as it appears to be necessary and effective in assuring personnel compliance to personnel survey requirements. (See Violation D response.)
- · Conduct a review of the effectiveness of the overall radiation protection program with the goal to identify areas for improvement. We will capitalize on the "fresh look" views from recent additions to the radiation safety function. The results of these reviews will be documented and appropriate actions will be developed for implementation.
- (2) Early scheduling and expansion of 1991 external audit to provide a comprehensive independent review of the nuclear safety programs
  - · Place special emphasis on locating consultants with significant expertise in related fields, who will provide an aggressive, fresh, pragmatic, independent assessment of the nuclear safety programs of primary concern.

Mid-year '91

2/15/91

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