

Process Technology North Jersey

Subsidiary of RTI Inc.

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June 19, 1989

Mr. John White, Chief
Nuclear Materials Safety Section C
United States Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

License No. 29-13613-02

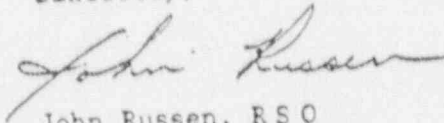
Dear Mr. White:

At the enforcement conference meeting I believe it was me who was asked if the console switch had been interchanged with the cell start up key switch. My response to this question was no, that the switches had never been interchanged. My response at the time was based on our records and my memory.

After discussions with Operators and the Operations Manager, John Singleton, I have since learned that my response was in error in one respect, John Singleton, had since indicated that he had interchanged the switches once during a repair. This interchange did not include the electrical contact blocks on the base of each key-lock assembly, therefore no electrical wiring was effected. This interchange of parts was not logged in the Shift Supervisors Log Book by John Singleton. At the time of the enforcement meeting, I did believe that the method of repair was that the switch was returned to service after lubrication as is indicated in the supervisors' log on February 1, 1989.

Please make this correction in your records.

Sincerely,


John Russen, RSO

JR:mb

cc: J. Scandalios
T. Varaklis
RSO File

9101100329 900717
PDR FOIA
JONES90-333 PDR

CASE NO. 1-89-006

EXHIBIT 38
PAGE 1 OF 1 PAGE(S)

E13

*Copy
to rooming party RTI
RS file 6/27/89
S/LW*

April 26 1989 EA

Paul Shapiro, John Kessen, John Scandalinos, Mal, JMA, DSH, JMG, MTT, JRW, Co
Roy Lessey Bob Wright

Introduction:

Purpose of ^{conf} policy. Expect attention to detail + ^{full} compliance
why we hold this + possible outcomes of the conf. Note conditions for
issuance of ~~press~~ ^{press} release

We take conferences very seriously.

Licenses has no opening comments

John White asked MTT to go through the violations.

Markene notes date error in rept on p 204. 5/3 Feb vs March. Will address

~~the~~ ~~to~~ ~~take~~ ~~back~~ in EC rpt.

Re 1, door lock failure (20.201(EX6)) on door lock - Tass reported. He
displayed ~~the~~ ^a lock similar to the lock that malfunctioned. The
decorative plate that covers the screws holding the door lock to the door
comes loose on occasion. He noted that the limit switch on the door
that drops the source was always operational.

John Kessen then took over. He said in Feb. an operator reported that
'The door knob was loose.' what was meant, they say, is that
the decorative plate came loose. Kessen went down + the fixed it.
There was not indication you could open the door due to this
condition. Tass saw their ^{3 sets of} records for 12/8 - 2/13, that he checked personally,
there was not indication that anyone gained access to the cell by
tampering with lock.

Kessen resumed. He checked the door + found it fully functional. Bet.
2/5 + 2/13, the plate came loose again. Sometime during that week Kessen
went again + tightened the plate. On Feb 13, Shapiro was able to apply
pressure to the door latch + get it open. Shapiro said he vigorously
twisted the door knob + was able to open it, dropping the source. He was
able to duplicate it. They shut down then. Mal pursued whether the
computer logs all entries, regardless of whether facility operating or not
Kessen + Shapiro confirm that this was true

E/4

Refer to RT

12/2/89
SPW
OS

Jay notes that the nearest discrepancy in facts seldom comes up. Like it discussed at court, Russen said no. After the fact, they reviewed the matter with other operators, Russen's personal experience with the matter, and review of logs. In no case was anything found to suggest a problem with the door security or interlock system. Jay asked if operator involved was interviewed. That said he did, & that Mike Ayers said the report description is not the way it happened. Roy Lacey noted that a lot of information came, apparently, from telephone calls to one operator (Ayers), & was not discussed at court interview.

When Shapiro found the problem, Russen went down & found the inside door knob was damaged from having been (apparently) slammed against the wall. The door was repaired ^{by replacing the knob & set} & a doorstop installed to prevent recurrence. They don't know when the knob was damaged, & none of the operators reported any damage before ^{the} ~~the~~ ^{the} problem with being able to open the door on Feb 13.

Shapiro said that each time they're ready to start up and the door is closed, the operator pushes on the door to make sure the latch works. Jay asked about the report suggesting something happened to the door in late Jan & that RSO was notified & he & operator fixed the door. Russen said he has no recollection of such an incident. Marlene was asked about the base further & apt. She said it was reported by ~~the~~ operator, not based on a record. Jay pursued further. They're saying it couldn't have involved the interlock. Mel asked for confirmation that computer would record any entry made by "jiggling" the door. Russen said yes. If someone entered the ~~cell~~ cell, it would have recorded it. ~~It~~ since door always locked ~~when~~ when closed, even when shut down. Signal to the computer is from microswitch. The door now covers the entire opening to the maze. Russen said damage to the knob was sufficient to have caused misalignment, permitting the jiggling of door knobs to allow entry. ~~Attention to that~~ Their position is, Shapiro said, that there was no prior notice of a problem until Shapiro found the malfunction.

Lessey discussed way to find out what was said by the operator. He proposed deposit of the operator under oath, or any other operators as well. Jay proposed taking the matter under advisement. Lessey also requested any factual notes taken during the phone discussions. Tass responded to question from Dan. He (Tass) questioned Agent, ~~who~~ who said he had never entered the ~~cell~~ cell once he found the faceplate on the latch loose.

He change in procedure (i.e. ^{90 sec. start time delay} replaced ~~key~~ with toggle switch) - Tass responded. He asked if rpt date of 2/1/89 was correct. MT said yes. He said he checked sup. log book + found entry that key switch on the console malfunctioned. Entry said Singleton contacted Tass' EE (John Wallace) in N.C. The key wouldn't rec'd back, so startup bell continued. He was advised to clean the lock. He removed the lockset, cleaned + oiled + all worked well to Mar. 9. On Mar. 9, John Dutton said the startup key switch failed (the switch fell apart + kept repeating the 90 sec. delay message). Dutton discussed w/ Shapiro + Tass whether toggle switch could be installed. This would not take away the 90 sec. time delay. They reviewed license + application + ~~etc~~ and decided it was not possible. ~~They~~ Did not review startup procedure, Russian one. Shapiro said in retro. spec they should have reviewed the procedure + would have contacted ~~the~~ NRC because of conflict in procedures, one of which allows RSO to make deviation to the procedure in "emergency conditions", if done in writing. Tass said no minutes kept of the meeting. Since 90 sec startup time was recognized as required. Tass admitted that no emergency existed, but it wasn't their intent to revise the procedure. There is a memo + record in operator's log. The following day, they got the proper key sets and replaced it. They now have a spare. It was installed in August + failed in March. Plastic cam in the lock is what failed. John White questioned the statement in the report that ~~key~~ console key switch and startup key switch were exchanged on 2/1/89. Russian said he wasn't there, but log indicates Tass did not occur, but only cleaning and oiling, as discussed above. The refer. in the ^{insp. rpt.} ~~log~~ to

The ~~idea~~ ^{idea} removing the lock

~~Shapiro's discussion of the lock~~ was incorrect. Should have referred to plant superintendent, ^{Superior who was quoted in the doc} & day summaries - no intention violation, didn't review proper procedure, made honest mistake, ~~offer~~ agree that violation existed for 24 hrs but was taken corrected, & in future they'd do w/ SRB.

He needs ~~the~~ ^{water} gauge for monitoring pool level - Tass said in 5/27/88 in a letter to D.J. Davis, they submitted change to application of ~~SRB~~ ^{early} & meeting on 5/18 by which this commitment was replaced with a series of float switches. Tass read from the 5/27 letter that described how the system worked. White pointed out that it wasn't clear to us that this was a change. Shapiro pointed out letter said it was a change, but White still felt it wasn't clear. Tass said it was their intent to substitute the system described in the letter of 5/27 for the previously described system. Markene asked why Shapiro cited this in his audit. Shapiro said the response to that audit ("Not require" plus oral communication) was made. Dan asked if a monitoring gauge is required. White said he didn't know. Could be in SRB Review Plan. Tass said current ~~equipment~~ equipment would drop the source & lock the cell door if water level drops to -1/2". Tass noted that the matter was also discussed in a 5/1/88 w/ Friedman when he came for an inspection. Lesrey said, on this basis, they deny the violation. Russen asked if the matter was discussed at exit. Markene said yes. Scandalous & Russen said they didn't recall.

Re Audible alarm above sty pool only and in sty pool room. ~~The~~ Russen said they identified during 2/17 audit by Shapiro & was corrected on 4/19 by amplifying the alarm. Now can be heard in Control Room. Russen admitted it fell into crack & didn't get fixed sooner. Licence identified. Shapiro was asked by Dan about response. Response took ~ 10 days ~~at~~ Tass time, but said the problem would be corrected. Dan

+ mal process. Was date established? Shapiro said it was, but didn't recall if met or not. Shapiro said it got overlooked. Dan notes we're trying to determine if this was just a screwup, or the process is faulty. Shapiro said they've formed ^{Rus. Inst.} ^{Chairman etc} Committee, that has authority to ~~see~~ authorize + take corrective action to assure that items do not fall through the crack. They've also prepared procedure on duties of RSO. RPC will meet monthly + keep minutes, and will perform specified duties. They think this will assure doing things on a timely basis. The RPC will also perform a monthly QA audit of the rad safety program, but not as extensive as Shapiro's quarterly audits.

Re RSO insuring full compliance - citing 2/17/69 incident re mal functioning lock on maze door.

Noted as previously discussed w/ stem 1. Deny the violation

Re Monitor on water treatment system not compared ^{monthly} w/ survey instrument. Tass responded. He referred to letter to Davis of 6/7/68 Tass said ~~the~~ intent was to check the ionisation beds w/ a portable survey instrument for activity, not to check the probe for response. White explained that what we understood was that they would use another instrument (a survey instrument) to qualitatively ~~more~~ determine if some levels ~~are~~ are being read. They say they do this weekly, but this is a survey of the entire system. We can't see a comparison. They ^{Shapiro's} say there is no detectable reading. Every 6 mos. They check response of the water treatment system detector with a check source. They believe they are in compliance + would like clarification if they're not. They believe the survey ^{they do} is the verification, and that it's done 4x as often as req'd. The monitor on the system set to alarm at 2x bkgrnd.

They deny the violation.

Re corrective ~~and~~ actions to audits by 3rd Aug

Shapiro said, except for the examples cited. They've always responded to Stobden's wants. They've taken corrective action, as described previously. A memo was apparently misplaced or not ~~received~~ ^{received}.

The audit was addressed to Mr. Bath w/c to Shapiro. Bath reviewed + sent with memo to RSO. Russett admitted there were things in the report that req'd response. ~~That~~ He felt at the time that no response was req'd. He doesn't recall getting the report. Shapiro said of specific problems highlighted by Stobden at exit, they take prompt action to correct. Leisley pointed out their good compliance record in this area in past.

Re exposure reports not provided within 30 days.

Russett said these are now current. They were ^{impractical} no exposures. That was about 10 MR. In compliance in w/c. He now has someone else working with him on this, and system in place to prevent recurrence.

Re failure to do ^{radiation} surveys after installation of sources

Tass - Re Aug 15, added 200k curies to 800k curies, well below max source strength so deemed surveys not needed. Did do currying surveys to assure no abnormalities. Re audit of 12/ by Shapiro, he told Russett he thought full survey needed, so Russett shut down to do the surveys. White asked Tass that he understood they made decision surveys not needed after first instance since < 1.2 M curies involved. Even after Stobden made ~~survey~~ audit finding, they felt it was because he didn't understand they'd had 1.2 M curies before. Now have 1.3 M ^{curies}. Russett said surveys were later done, about one month after source ~~installation~~ installation. White asked about current understanding. They agreed that any installation will require survey. Doing ~~survey~~ aspect (were done but late) but admit later done only a partial survey that was inadequate.

Re preventive maintenance procedures - checks not done as required. Russian said all ~~the~~ PM done. He can't find any semi-annual PM that is required. There are some that was a tab, but ~~not~~ only monthly + quarterly are required. Tass said these were new procedures for a new system, and they were being evaluated + should have gone into effect before January. Markere pointed out that maintenance procedures also specify that certain switches should be checked semi-annually. Russian notes they do not quarterly.

White asked about ~~oper~~ staffing levels of operations scope. Tass said they've been fairly stable. They've stabilized with 4 operators. Have had turnover in material handlers, but have replaced.

Re rpt statement that an operator said not enough time to do everything, Scandalione stated his philosophy re safety. Fidelity yet to operator > 60% of installed capacity, so doesn't understand how anyone can say they don't have time. White questioned. Scandalione said when resources down they have time to perform other functions. Russian said they do have the time, just weren't getting them done.

Deny violation re semi-annual since done quarterly.

We asked about the name change. Scandalione said he can't address the reasons. Re financial considerations, he'll have answer this week.

Lessey asked to be put on all correspondence. Markere said a note as in the license file.

Niel summarized our purposes + noted they've been very helpful. We'll continue to look at them carefully. He urged them to contact us if there is any question on any operational matter.

Jim Allan noted that RTI operates under a microscope & any indication of equipment or operational problem receives attention at highest levels of the Commission.

Dan summarized enforcement ~~record~~ policy.

Lessey said they appreciate the dialogue. He cited their good enforcement record during a period of intense ^{augmented} inspection effort. He asked that the company be given ~~the~~ app. credit for this.

Conf ended at 12:15

Post-conference briefing - JMA, MRK, DJH, JMG, MST, JNJ, JRW

Look carefully @ computer records

Move to depose Kern, Smith & Ayers under oath.

Involve OI, as assist to inspection, if possible.

CONVERSATION RECORD

TIME 2:25 PM DATE 8/3/89

TYPE VISIT CONFERENCE TELEPHONE

INCOMING OUTGOING

ROUTING	
NAME/SYMBOL	INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

ORGANIZATION (Office, Dept., Bureau, etc.)

TELEPHONE NO.

JOHN RUSSEN, RSO

RTI

SUBJECT

DATE OF OPERATOR'S MEETING REPORTEDLY HELD AT RTI RE: CLIMBING INCIDENTS

SUMMARY

RUSSEN SAID HE WOULD ASK AROUND AND LOOK AT RECORDS TO GET A MORE ACCURATE DATE THAT THIS KEY MTC TOOK PLACE. I SAID HIS REPORTED DATE OF 3/1/89 DID NOT SEEM TO FIT AND HE AGREED; HE SAID HE THOUGHT IT WAS MUCH CLOSER TO THE DATE OF HIS NEAR BE CLIMBING OF THE DOOR (MEMO OF 4/14/89). HE WILL GET BACK TO ME

ACTION REQUIRED

AWAIT RETURN CALL

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

E. WILSON, OI

[Signature]

8/3/89

ACTION TAKEN

RUSSEN CALLED OI BACK ON 8/4/89, 9:10 AM, AND INFORMED OI SECRETARY MARCI HILMES THAT DATE WAS MOST LIKELY 4/11/89

SIGNATURE

TITLE

DATE

[Signature]

Investigator

8/9/89 E/S

50277-101

© GPO : 1981 O - 361-526 (7227)

CONVERSATION RECORD

OPTIONAL FORM 271 (12-76) DEPARTMENT OF DEFENSE

CLIP

I CALLED RUSSEN BACK 8/9/89 TO CONFIRM + HE REPORTED NOTHING WAS FOUND IN WRITING BUT AFTER REVIEWING TIME CARDS + TALKING WITH HILMES IT APPEARED LIKE THE DATE WAS 4/11/89