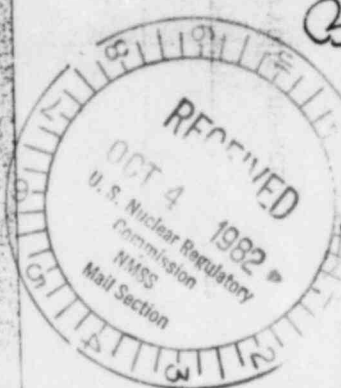


PDR  
Return to:  
396-55

NORM, 70-1100 9/16/82

ATTACHED, AS YOU REQUESTED,  
IS A COPY OF A TYPICAL  
ANI INSPECTION REPORT.  
DO YOU NEED ANYTHING ELSE  
REGARDING THIS MATTER?



Bob SHEERAN  
CE



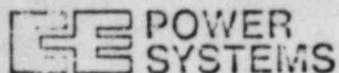
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FEE EXEMPT

info only

21293



E.J.P. NOV 20 1981

TO: P. R. Rosenthal  
R. E. Sheeran

November 18, 1981

FROM: T. B. Bowie

SUBJECT: ANI Inspection  
August 25-26, 1981

A copy of ANI's Inspection Report and our acknowledgement of same is attached.

Please review this report in addition to our referenced response to Mr. Fuller. A meeting to discuss same will be scheduled during the initial days of January 1982.

*T. B. Bowie*  
T. B. Bowie

TBB:sas

cc: H. V. Lichtenberger  
F. J. Pianki ← THIS COPY FOR  
W. G. Robertson--w/o cy.

# AN AMERICAN NUCLEAR INSURERS

BURT C. PROOM, CPCU  
President

NUCLEAR ENGINEERING DEPARTMENT  
Leo P. Mariani, Vice President



October 20, 1981

Mr. Thomas B. Bowie, Manager  
Nuclear Materials & Security  
Combustion Engineering Inc.  
1000 Prospect Hill Road  
Windsor, CT 06095

RE: Inspection of Windsor Site  
August 25-26, 1981  
ANI Policy NF-49

Dear Tom:

During the meeting with Dr. Rosenthal and yourself, procedures for development and transmittal of recommendations were discussed at some length to promote a better understanding relative thereto between Combustion Engineering and American Nuclear Insurers. Because of the organizational setup of your company with some differences in procedures arising from the major differences in the functioning of the Production Division as compared with the Development area, it was agreed that we would undertake to indicate as clearly as possible the area of application of our recommendations. Also, as agreed, a copy of this letter is being directed to Dr. Rosenthal as confirmation of the discussion with him.

During the discussion it became evident that administrative consideration would be required before a commitment is made to meet certain of the recommendations. As regards past recommendations, we are awaiting a response to Mr. Fuller's letter of February 24, 1981, and subsequently referred to in his letter of August 24. If there are further questions regarding past recommendations, please contact us.

New recommendations

Records Retention. (Production and Development Areas)

Retention of records important to subsequent defense of a claim as described in our Engineering Bulletin 80-1B was again reviewed. It is my understanding that progress has been made in this direction but no documentation of an overall procedure and policy was immediately available.

The comments in this letter are based upon conditions, practices and property observed and information made available at the time of the inspection which was made for underwriting purposes. These comments do not purport to list all hazards nor to indicate that other hazards do not exist. No responsibility is assumed for the correction or control of any conditions, practices or property, and neither the making of the inspection nor any report or correspondence thereon shall constitute an undertaking, on behalf of or for the benefit of the insured or others, to determine or warrant that the facilities, operations or property are safe or healthful, or are in compliance with any law, rule or regulation.

October 20, 1981

Mr. Thomas B. Bowie, Manager  
Nuclear Materials & Security  
Combustion Engineering Inc.  
1000 Prospect Hill Road  
Windsor, CT 06095

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81-4 Therefore, it is recommended, applicable to all radiological activities, that an overall program and policy be formulated for identification of the records listed in ANI Engineering Bulletin 80-1B and for their retention in safe and retrievable storage.

This recommendation will largely replace prior recommendations 80-1 and 80-2.

(Development Area) The correlation of the in-house TLD readings with the vendor's report is continuing in a very commendable manner. Also, I believe that quality control criteria are being formulated. Verification of accuracy is essential because in-house readings are subject to particular question in event of subsequent litigation.

81-5 It is recommended that your proposed TLD program include well documented Quality Control procedures following the attached guide as a minimum (copy of which has already been sent to Dr. Rosenthal).

Prior recommendation 81-2 calls for a quality control program for the bioassay and related in part to both the production and development areas. Bioassay readings are consistently reported as less than the MDA of 1  $\mu\text{gm}/\text{l}$  or 1 ppb (2 ppb in a few instances). This is an unusual and highly commendable record and should of course be well verified. Your laboratory procedures were noted and appeared appropriate, nevertheless independent verification is advisable.

The clarification discussion included a commitment that the production area will spike samples (spike source and analysis thereof from an independent source) for analysis in the development laboratory with the results to be verified in production area.

With relation to prior recommendation 80-1, it appeared that the training quiz is not signed by the trainee and it was again recommended that this be done. I believe Dr. Rosenthal concurred with this recommendation.

As regards prior recommendation 81-3, a review of the audits disclosed appropriate reference to the completion of prior audit recommendations and the action taken. Recommendation closed.

Summary. Status of prior open recommendation from Mr. Fuller's letter of February 24, 1981.

79-1 Check source on instruments. Closed, since alternate program of documented daily technician instrument checks appears effectively implemented.

October 20, 1981

Mr. Thomas B. Bowie, Manager  
Nuclear Materials & Security  
Combustion Engineering Inc.  
1000 Prospect Hill Road  
Windsor, CT 06095

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80-1 &

80-2 Development and retention of records. Replaced in part by  
Recommendation 81-4. Dated syllabus and signatures are open.

81-1 Dosimetry of visitors. Open.

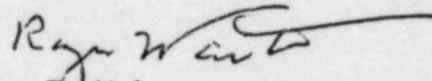
81-2 Quality control of urinalysis procedure.  
Open with relation to clarification above.

81-3 Resolution of audit findings. Open, pending response to item.

If any misunderstanding on my part is evident as to your current practices, I will be happy to discuss this point with the people interested. In any event, may we have a response within 60 days regarding implementation of the foregoing recommendations. Any comments on other parts of this letter will be welcome.

The time and assistance rendered by each member of the Combustion Engineering staff helped greatly in promoting an understanding of your various activities.

Yours very truly,



Roger T. Waite  
Engineering Consultant

RTW:mc

cc: Dr. P. R. Rosenthal  
Mr. W. G. Robertson  
Mr. F. Catudal  
Mr. T. F. Hartley, Jr.