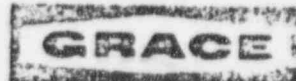


W. R. GRACE & CO.



RESEARCH DIVISION

Washington Research Center, Clarksville, Maryland 21029

February 28, 1973

Mr. James P. O'Reilly  
Director  
USAEC  
Directorate of Regulatory Operations  
Region 1  
970 Broad Street  
Newark, New Jersey 07102

Dear Mr. O'Reilly:

This is an additional response to your letters of January 16 and 18, 1973. You will find attached to this letter responses to the safety items brought to our attention from Mr. Epstein's inspection of December 12-14, 1972, and from Mr. Cooley's inspection of November 29-30 and December 1, 1972.

Should you have questions concerning these responses, we will be pleased to discuss them with you.

Sincerely,

*G. E. Ashby*  
G. E. Ashby  
Vice President  
Nuclear

GEA:srh

Attachments

*A/148*

9501170244 940216  
PDR FOIA  
SARKISS93-499 PDR

Cable - Gracerad

Tel. (301) 531 - 5711

TX - 710 862 1886

Response to Safety Items Noted in  
Enclosure II of AEC Letter Dated 1/16/73  
Docket No. 70-456

1. Grace has established as a formal requirement that the Radiation Protection Officer be notified immediately when a non-standard operation is to be performed. If such an operation is not covered by an approved SOP or if containment is to be breached or might be breached in a manner not covered by an SOP, a temporary procedure will be written and approved by the Nuclear Safety Committee before the operation will be started. In all cases of non-standard operations, the activity will be monitored by radiation safety personnel.
  
2. Our procedure is to present to the Nuclear Safety Committee all instances of equipment deficiencies for analysis and all proposed equipment modifications for approval. If conditionally approved by the Committee, the equipment modifications are made and preoperational tests are conducted. During the preoperational tests those parameters considered critical are measured or monitored to determine if the design parameters or the SOP's used meet the health and safety requirements. Final approval by the Nuclear Safety Committee will be based upon the results from the preoperational tests.

GEA  
2/28/73

Response to Safety Items Noted in  
Enclosure No. 2 of AEC Letter Dated 1/18/73  
Docket No. 70-456

1. All flammable materials have been removed from areas where fissile materials are stored.
  
2. All storage racks have been firmly secured against displacement or in one case when this was not feasible the rack has been removed from the facility.
  
3. The storage racks have been inspected to determine if positive retention of fissile material is provided. In some cases, design changes of the storage racks were necessary. All storage racks now provide positive retention of fissile material.

GEA  
2/28/73