



NUDOCS

U.S. NUCLEAR REGULATORY COMMISSION
**RESPONSE TO FREEDOM OF
INFORMATION ACT (FOIA) REQUEST**

NRC FOIA REQUEST NUMBER(S)

FOIA — 94-140

RESPONSE TYPE

☒ FINAL

☐ PARTIAL

DATE

APR 18 1994

DOCKET NUMBER(S) (if applicable)

REQUESTER

Ms. Nancy D. Harnett

PART I.—AGENCY RECORDS RELEASED OR NOT LOCATED (See checked boxes)

☐ No agency records subject to the request have been located.

☐ No additional agency records subject to the request have been located.

☐ Requested records are available through another public distribution program. See Comments section.

☐ Agency records subject to the request that are identified in Appendix(es) _____ are already available for public inspection and copying at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC.

☒ Agency records subject to the request that are identified in Appendix(es) **A** are being made available for public inspection and copying at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC, in a folder under this FOIA number.

☐ The nonproprietary version of the proposal(s) that you agreed to accept in a telephone conversation with a member of my staff is now being made available for public inspection and copying at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC, in a folder under this FOIA number.

☐ Agency records subject to the request that are identified in Appendix(es) _____ may be inspected and copied at the NRC Local Public Document Room identified in the Comments section.

☐ Enclosed is information on how you may obtain access to and the charges for copying records located at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC.

☒ Agency records subject to the request are enclosed.

☐ Records subject to the request have been referred to another Federal agency(ies) for review and direct response to you.

☒ Fees

☒ You will be billed by the NRC for fees totaling \$ **73.01 ***

☐ You will receive a refund from the NRC in the amount of \$ _____

☐ In view of NRC's response to this request, no further action is being taken on appeal letter dated _____, No. _____

PART II. A—INFORMATION WITHHELD FROM PUBLIC DISCLOSURE

☐ Certain information in the requested records is being withheld from public disclosure pursuant to the exemptions described in and for the reasons stated in Part II, B, C, and D. Any released portions of the documents for which only part of the record is being withheld are being made available for public inspection and copying in the NRC Public Document Room, 2120 L Street, N.W., Washington, DC in a folder under this FOIA number.

COMMENTS

* The fees associated with the processing of your request are as follows:

Search: Clerical = 1 1/2 hrs. @ \$14.31/hr. =	\$21.51
Review: Clerical = 1/2 hr. @ \$14.31/hr. =	7.20
Professional = 3/4 hr. @ \$30.19/hr. =	22.50
Duplication: 109 pages @ \$0.20/pg. =	21.80
TOTAL	\$73.01

You will be billed by NRC's Division of Accounting and Finance for the above amount.

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PDR FOIA
HARNETT94-140 PDR

SIGNATURE, DIRECTOR, DIVISION OF FREEDOM OF INFORMATION AND PUBLICATIONS SERVICES

[Signature]

APPENDIX A

Documents to be Released in their Entirety

<u>No.</u>	<u>Date</u>	<u>Description</u>
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License No. 37-20826-01

- | | | |
|----|----------|---|
| 1. | 10/20/93 | Routine Inspection No. 030-21230/93-01 (12 pages). |
| 2. | 12/9/92 | Routine Inspection No. 030-21230/92-001 (22 pages). |
| 3. | 9/4/91 | Routine Inspection No. 91-001 (2 pages). |
| 4. | 10/17/90 | Handwritten NRC Form 591 (2 pages). |
| 5. | 12/17/88 | Inspection No. 030-21230/88-01 (5 pages). |
| 6. | 10/21/88 | Inspection No. 030-21230/88-001 (46 pages). |
| 7. | 5/6/87 | Inspection No. 030-21230/86-01 (7 pages). |
| 8. | 11/12/85 | Inspection No. 030-21230/85-01 (10 pages). |

License No. 37-20826-02

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|-----|---------|--|
| 9. | 3/31/94 | NRC Form 591 (1 pages). |
| 10. | 12/9/92 | Routine Inspection No. 030-21230/92-001 (2 pages). |

OCT 20 1993

Docket No. 030-21230

License No. 37-20826-01

Alaron Corporation
Northeast Regional Service Facility
ATTN: Jonathan H. Wallace
Radiation Safety Officer
RD#2, Box 2140A
Wampum, Pennsylvania 16157

Dear Mr. Wallace:

Subject: Routine Inspection No. 030-21230/93-001

This letter refers to your September 24, 1993 correspondence, in response to our September 15, 1993 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

No reply to this letter is required. Thank you for your cooperation in this matter.

Sincerely,

Original Signed By:
Walter J. Pasciak

Walter J. Pasciak, Chief
Industrial Applications Section
Division of Radiation Safety and
Safeguards

cc:
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania

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ALARON CORPORATION

Northeast Regional Service Facility

September 24, 1993
WL 099310

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Reply to Notice of Violation, Docket No. 030-21230

Dear Sirs:

This letter provides the response directed by letter dated September 15, 1993, from Mr. Scott Moore, Acting Chief, Industrial Applications Section, Division of Radiation Safety and Safeguards, U.S. NRC, Region 1. The violations referenced (exceeding 200 mrem per hour on the surface of a package) occurred when control rod blade storage racks shipped from ALARON to Niagara Mohawk Power Corporation, Nine Mile Point Unit #1 moved inside the shipping package.

The immediate reason for the violation was inadequate blocking and bracing of the control rod blade storage racks inside the package. When one of the racks moved some 18 inches toward the door of the container, dose rate on the surface reached 260 mrem per hour. Several underlying factors contributed. First, most of ALARON's shipping experience has been with waste packages completely filled and closely packaged. As a consequence, the crew that installed and inspected the bracing was not aware of the ease with which the racks could slide. In their haste to minimize their own dose while constructing bracing, they installed what they thought was adequate bracing. Second, the review required by ALARON's shipping procedure was not effective in revealing the inadequate bracing.

Corrective steps already have been taken to prevent recurrence. First, a review of the incident and underlying causes with all employees at the Wampum facility and corporate regulatory and operations personnel was completed by the Radiation Safety Officer and the Facility Manager shortly after the incident (completed July 1993). As a result, the shipping procedure was revised to require final authorization by the Radiation Safety Officer when shielding is used or hot particle contamination is involved in shipping. This revision was issued July 30, 1993. In addition, a training outline of issues, concerns, and practices regarding loading, blocking, and bracing of radioactive material was prepared August 15, 1993, to provide training for similar shipments in the future.

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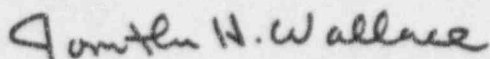
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Page 2
WL 099310

Corrective steps remaining include training sessions conducted by the Radiation Safety Officer for affected employees at the Wampum facility using the training outline referenced above. This training began September 23, 1993 and should be completed by September 30, 1993. The training will be incorporated in Alaron's shipping procedure and thus will be part of the annual training required by 49 CFR 172.704.

All corrective steps will be completed by September 30, 1993. Please contact me at 412-847-6210 should you have any questions regarding them.

Sincerely,



Jonathan H. Wallace
Radiation Safety Officer

JHW/shy

cc: Regional Administrator, U.S. NRC Region 1
Angus Hinson, Manager, Corporate EH&S, QA
John Joos, Facility Manager

SEP 15 1993

Docket No. 030-21230

License No. 37-20826-01

Alaron Corporation
ATTN: John P. Joos
Facility Manager
Point Industrial Park
RD #2, Route #18
New Beaver Boro
Wampum, PA 16157

Dear Mr. Joos:

SUBJECT: Inspection No. 030-21230/93-001

This refers to an announced, special inspection of the Alaron Corporation facility located in Wampum, Pennsylvania. The inspection was conducted by Messrs. John R. McGrath and Scott W. Moore of this office on August 19, 1993. Discussions of these findings were presented by Messrs. McGrath and Moore to the individuals listed in Section I of the enclosed Inspection Report following conclusion of the inspection.

The areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of observations by the inspectors, review of records and discussions with licensee personnel.

Based on the results of this inspection, it appears that with regard to shipment 93-RM-63 on July 19, 1993, control rod blade storage racks shifted during transport resulting in a radiation level of greater than 200 millirem per hour at the external surface of the container.

Based on these findings, the NRC determined you did not conduct certain of your activities in full compliance with NRC requirements. A Notice of Violation is enclosed as Appendix A and categorizes the violation by Severity Level in accordance with the "General Statement of Policy and Procedures for NRC (Enforcement Actions)", 10 CFR 2, Appendix C (Enforcement Policy). The NRC recognizes that the significance of the violation was low because of the isolated location of the high radiation reading and the unlikelihood that an individual could have received significant exposure. Therefore, the violation in the enclosed Notice of Violation is classified at Severity Level IV in accordance with 10 CFR Part 2, Appendix C. However, you should emphasize to your staff the importance of proper

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blocking and bracing of radioactive shipments. Any similar violation of this type could result in escalated enforcement. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

Please use the enclosed self-addressed, green envelope when you respond to this letter to assist us in the timely processing of your response.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

The response directed by this letter and the accompanying Notices are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We request you give prompt attention to these matters. Should you have any questions regarding them, please contact John McGrath at (215) 337-5069.

Sincerely,

Original Signed By:
Mohamed M. Shanbaky



Scott W. Moore, Acting Chief
Industrial Applications Section
Division of Radiation Safety
and Safeguards

Enclosures:

1. NRC Region Report No. 030-21230/93-001
2. Appendix A, Notice of Violation
3. Appendix C to 10 CFR 2

cc w/encl:

Public Document Room
Nuclear Safety Information Center
Commonwealth of Pennsylvania

Alaron Corporation

3

bcc:

Region I Docket Room (w/concurrences)

D. Holody, RI

K. Smith, RI

RI:DRSS
JE McGrath

8/5/93

RI:DRSS

SV Moore

8/5/93

9/8/93

APPENDIX A

NOTICE OF VIOLATION

ALARON Corporation
Wampum, Pennsylvania 16157

Docket No. 030-21230
License No. 37-20826-01

During an inspection conducted on August 19, 1993 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions", 10 CFR 2, Appendix C, the violation is listed below.

10 CFR 71.5(a) requires that licensees who transport licensed material outside the confines of their plants or deliver licensed material to a carrier for transport comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 170-189.

- A. 49 CFR 173.441 (a) requires that each package of radioactive materials offered for transportation shall be designed and prepared for shipment so that under conditions normally incident to transportation the radiation level does not exceed 200 millirem per hour at any point on the external surface of the package. In addition, 49 CFR 177.842 (d) requires that packages must be so blocked and braced that they cannot change position during conditions normally incident to transportation.

Contrary to the above, on July 19, 1993, Alaron Corporation shipped a container (Shipment No. 93-RM-63) consigned to Niagara Mohawk Power Corporation, Nine Mile Point Unit #1, which upon arrival was found to read 260 millirem per hour at one point on the external surface of the package. This radiation reading was later confirmed by Alaron personnel. Further investigation revealed that, notwithstanding the blocking and bracing provided, the contents of the container shifted during transport.

This is a Severity IV violation (Supplement V).

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Pursuant to the provisions of 10 CFR 2.201, Alaron Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 030-21230/93-001

License No. 37-20826-01

Docket No. 030-21230

Licensee: ALARON Corporation
RD #2, Route 18
Wampum, Pennsylvania 16157

Priority 4

Category K

Facility Name: ALARON Corporation

Inspection Date: August 19, 1993

Inspector: John R. McGrath
John R. McGrath, Senior Health Physicist

9/14/93
date

Approved by: Scott W. Moore
Scott W. Moore, Acting Chief
Industrial Applications Section
Division of Radiation Safety
and Safeguards

9/15/93
date

Inspection Summary: Special, announced inspection conducted on August 19, 1993.
(Inspection Report No. 030-21230/93-001)

Areas Inspected: Circumstances surrounding the apparent violation of DOT regulations in the shipment of a package from Alaron Corporation to Nine Mile Unit #1. Nine Mile reported elevated radiation levels at the surface of the package upon receipt at Nine Mile.

Results: It was confirmed that the package shipped on July 19, 1993 had shifted during transport, resulting in higher radiation levels at one point on the external surface of the package. One violation was identified.

DETAILS

1.0 Persons Contacted

The following personnel were contacted during the inspection.

- * John P. Joos, Facility Manager, Alaron Corporation
- * Jonathan Wallace, Radiation Safety Officer, Alaron Corporation
- * Angus R. Hinson, Corporate Manager, Environmental Health, Safety, and Quality Assurance, Alaron Corporation

George Tincani, Health Physics Technician, Alaron Corporation

- * Denotes personnel who attended the exit meeting.

2.0 Background Information

Alaron Corporation is licensed to perform decontamination of contaminated equipment at its facility in Wampum, Pennsylvania. On July 19, 1993, Alaron prepared to ship three control rod blade storage racks that they had decontaminated back to Nine Mile Point Unit #1. The package consisted of a sea-land container on a flat bed truck and was an LSA "Exclusive Use" shipment. The carrier was Priority Transport. The racks had been received from Nine Mile Point Unit #2 in a lead lined sea-land container and were to be shipped back in the same container.

On July 20, 1993, the NRC was notified by Nine Mile Point that they had received a shipment from Alaron and that a surface reading of greater than 200 millirem per hour was noted. Nine Mile also reported that 1 of 24 smear samples take on the exterior of the package was "above the limit." It was not clear to what "limit" the Nine Mile staff referred.

3.0 Discussions with Licensee Staff

In discussions with Alaron personnel, it was determined that Alaron was notified on July 20, 1993 of the Nine Mile findings. A telephone record indicates that Alaron was notified on July 20, 1993 at 11:05 am that a radiation reading of 260 millirem per hour was found at the surface of shipment 93-RM-63. Nine Mile staff did not indicate that any contamination was found.

On July 21, 1993, Messrs. Joos and Wallace traveled to Nine Mile to investigate. They met with the Nine Mile Rad Waste Supervisor and began an inspection and survey of the package. They confirmed the 260 millirem per hour reading on the rear (upper left) of the exterior surface of the container. They then proceeded to break the seal and open the container. They discovered that the top control rod rack had shifted during transport and was flush against the rear of the container. The 2" X 4" wood cribbing had come apart at the joints and was loose. The top rack had moved about 18 inches. The racks were 12 feet long and 7 feet wide. They had been placed in the sea-land container at an angle in an attempt to keep them from moving. The top rack was narrower than the bottom racks and the 2" X 4" cribbing was meant to keep the top rack from moving. A previous shipment to Nine Mile had been shipped with similar cribbing with no problems. There was no visible damage to the racks.

The licensee had taken a video of the survey at Nine Mile and the opening of the container. The inspectors reviewed this video which confirmed the above information.

Discussions were held with George Tincani, the health physics technician who was involved in the preparation of the shipment. Mr. Tincani stated that he had assisted in the construction of the cribbing and that since a previous shipment had no problems, this method of bracing was expected to be adequate. He performed the surveys of the exterior of the container and had found no reading higher than 50 millirem per hour. Mr. Tincani indicated that the licensee's management has discussed the incident with the Alaron staff and modified the procedures for blocking and bracing. He was aware that for all future shipments where hot particles are involved and/or where additional shielding is necessary, the RSO must sign-off prior to shipment.

Contrary to the requirements of 10 CFR 71.5 (a), Alaron did not provide adequate blocking and bracing of the shipment to keep the racks from moving within the container. This resulted in a radiation reading at the surface of the container that exceeded 200 millirem per hour. This is an apparent violation.

4.0 Review of Records

The licensee produced the shipping records showing that the shipment number 93-RM-63 was "Exclusive Use", LSA. Records of surveys done prior to shipment indicated that regulatory limits were met. The highest reading at the rear of the container was 50 millirem per hour. Readings were made with an Eberline RO-2 ion chamber. Records also showed that the shipment was properly braced according to the HP/QC technician. Copies of the Nine Mile receipt records were available. There was no indication on these records of any contamination.

5.0 Cause or Causes of Incident

The licensee determined that the 2" X 4" cribbing was not adequate to prevent front-to-rear movement of the racks.

6.0 Corrective Actions

The details of the incident were discussed with the licensee's staff in a special training session held on July 27, 1993. The licensee intends to follow up this training with more detailed training on proper blocking and bracing techniques. The licensee will have a training outline by August 31, 1993 and the training will be conducted by September 30, 1993.

The licensee also modified the shipping procedures, requiring the Radiation Safety Officer to review the blocking and bracing prior to shipment of each package that has shielding and/or involves hot particles. Their original procedures allowed the Radiation Safety Officer to delegate this responsibility.

7.0 Exit Meeting

An exit meeting was held with personnel identified in Section 1 of this report. The inspector presented the results of the inspection.

5.0 Cause or Causes of Incident

The licensee determined that the 2" X 4" cribbing was not adequate to prevent front-to-rear movement of the racks.

6.0 Corrective Actions

The details of the incident were discussed with the licensee's staff in a special training session held on July 27, 1993. The licensee intends to follow up this training with more detailed training on proper blocking and bracing techniques. The licensee will have a training outline by August 31, 1993 and the training will be conducted by September 30, 1993.

The licensee also modified the shipping procedures, requiring the Radiation Safety Officer to review the blocking and bracing prior to shipment of each package that has shielding and/or involves hot particles. Their original procedures allowed the Radiation Safety Officer to delegate this responsibility.

7.0 Exit Meeting

An exit meeting was held with personnel identified in Section 1 of this report. The inspector presented the results of the inspection.

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Docket No. 030-21230
030-30666

License No. 37-20826-01
37-20826-02

Alaron Corporation
ATTN: Peter F. Davin
Director, Business Development
Sale and Administration
120 Marguerite Drive, Suite 203
Mars, Pennsylvania 16046

Dear Mr. Davin:

Subject: Routine Inspection No. 030-21230/92-091

On November 19, 1992, Duncan White and Richard Gibson, Jr. of this office conducted a routine safety inspection at Point Industrial Park, Route 18, Wampum, Pennsylvania of activities authorized by the above listed NRC licenses. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspectors, interviews with personnel, selective examination of representative records and independent measurements by the inspectors. In addition, our inspection examined the activities covered in your correspondence dated October 19, 1992, and November 30, 1992. The findings of the inspection were discussed with J. Joos, T. Blythe and B. King, at the conclusion of the inspection. This also refers to the telephone conversation on November 30, 1992, between Jonathan Wallace and Duncan White.

Within the scope of this inspection, no violations were identified.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the Public Document Room. No reply to this letter is required.

ALARON OFFICIAL RECORD COPY

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December 8, 1992

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REGION 1

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Alaron Corporation

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Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Francis M. Costello, Chief
Industrial Applications Section
Division of Radiation Safety
and Safeguards

cc:

Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania
Jonathan Wallace, Radiation Safety Officer

bcc:

Region I Docket Room (w/concurrences)
Management Assistant, DRMA
D. Holody, RI

W
RI:DRSS
White/cmg

12/8/92

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Gibson
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FMC
RI:DRSS
Costello

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