

January 15, 1984

U. S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, PA 19406

Attention: Thomas T. Martin, Director Division of Engineering and Technical Programs

Re: Docket No. 40-00672 CAL No. 83-08 dated 5 August 1983

Gentlemen:

In response to Item No 7 listed in your Confirmatory Action Letter (CAL No. 83-08) dated 5 August 1983, Nuclear Metals, Inc. (NMI) is submitting descriptions of the following programs to you for your review. Additionally, this information is being forwarded to the Material Licensing Branch, Division of Fuel Cycle and Material Safety for inclusion into our Source Material License renewal application.

- 1). NMI's Internal Exposure Evaluation Program
- 2). NMI's Radiological Work Permit Program
- 3). NMI's ALARA Program

Attachment 1

Attachment 1 represents a review of the various aspects of our Internal Exposure Evaluation Program. This review includes all monitoring performed to evaluate uptake of radioactive materials.

Attachment 2

Attachment 2 is a Radiological Work Permit System Specification. This outlines how Radiation Work Permits (RWPs) will identify actual and potential radiation hazards associated with specific operations and the precautionary measures set in place to reduce exposures ALARA. This is accomplished by the establishment of prerequisite conditions that must be satisfied before operations covered by the RWP's are allowed to begin.

The program as described in the attached specification is divided into two parts, Special and Standard RWP's. Special RWP's are issued to cover non-routine operations. This aspect of the overall program was implemented

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during June of 1983. The Standing RWP's cover routine operations and involve a comprehensive retraining effort by our Training and Health Physics Departments. All NMI personnel will be cycled through these Standing RWP training sessions with an expected completion date of April 1, 1984. Therefore, full implementation of both aspects of the RWP Program is expected to occur by this date.

Attachment 3

This document is a policy statement made by NMI with regard to maintaining occupational radiation exposures ALARA for all NMI employees and visitors. This program has been written to incorporate the philosophy of the NRC's Regulatory Guide 8.10, Revision 1 into NMI's Radiation Protection Program in order to ensure that radiation exposures will be kept ALARA.

The first meeting of the ALARA Committee was held in December of 1983. Although this document states that we will hold quarterly meetings, we are scheduling monthly meetings for the next several months.

If you or your staff have any questions regarding this submission, please feel free to contact us.

Sincerely,

Frank J. Vumbaco, Manager Health and Radiation Safety

FJV:aj

Attachments

CC: Mr. Joseph C. Wang
U. S. Nuclear Regulatory Commission
Material Licensing Branch
Division of Fuel Cycle and
Material Safety
Washington, D. C. 20555

