OCT 15 1992

Docket No. 70-25

Rockwell International Corporation
Rocketdyne Division
6633 Canoga Avenue
Canoga Park, California 91303

Attention: Mr. Jon T. Nagamatsu, Vice President
Environment, Health, Safety, & Facilities

SUBJECT: RESPONSE TO NOTICE OF VIOLATION IN NRC INSPECTION REPORT NO. 70-25/92-01

Thank you for your letter dated September 28, 1992, in response to our Notice of Violation and Inspection Report 70-25/92-01, dated September 4, 1992, informing us of the steps you have taken to correct the items which we brought to your attention.

Your corrective actions appear to resolve our concerns regarding the violations and deviation referenced in the subject report. Your corrective actions will be reviewed during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

James Reese, Chief
Facilities Radiological Protection Branch

cc.
Mr. P. D. Rutherford, Manager
Radiation Protection & Health Physics Services

bcc w/copy of letter dated September 28, 1992:
Docket File
Inspection file
G. Cook
R. Huey
B. Faulkenberry
J. Martin
State of California
J. Zollicoffer

IE07
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE
WALNUT CREEK, CALIFORNIA 94596-5368

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OCT 15 1992

bcc w/o copy of letter dated September 28, 1992:
M. Smith

Region V/ann

MCillis
10/15/92

JReese
10/15/92

REQUEST COPY]	REQUEST COPY]	SEND TO PDR]
YES / NO]	YES / NO]	YES / NO]

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Rocketdyne Division
Rockwell International Corporation
6633 Canoga Avenue
Canoga Park, California 91303

Telex: 698478
ROCKETDYN CNPK

Rockwell International

September 28, 1992

In reply refer to 92RC-08445

U. S. Nuclear Regulatory Commission
Washington D. C. 20555
Attention: Document Control Desk

Subject: Reply to Notice of Violations and Notice of Deviation. NRC Inspection 70-25/92-01 of Rockwell International SNM-21 License.

Reference: NRC letter from R. J. Pate to J. T. Nagamatsu, "Notice of Violation - NRC Inspection Report No. 70-25/92-01", dated September 4, 1992.

Dear Sirs:

The Rocketdyne Division of Rockwell International is in receipt of the NRC Inspection report, 70-25/92-01, and the Notices of Violation and Notice of Deviation. Rocketdyne appreciates the assistance and advice of the Region 5 inspectors, and continues to believe that such inspections can only benefit Rocketdyne's licensed activities. We noted with satisfaction the positive comments in the inspection report regarding the ALARA program, the respiratory protection program, the bioassay and air sampling program, contamination control, the audit and corrective action program, the radiation safety and respiratory protection training programs and the environmental monitoring program. We also noted that three prior open items pertaining to fire extinguisher inspections (Item 70-25/89-03-01) and air samplers (70-25/91-02-01 and 70-25/91-02-02) were satisfactorilly closed-out.

1. Notice of Violation (Item 70-25/92-01-01)

Following the NRC inspection of December 1991, the program for calibrating air sampler flow meters was significantly improved, including logging of all air samplers on the computerized calibration system, and issuing a new procedure on flow meter calibration (NOP2ICP530017). These corrective actions resulted in NRC closeout of open items 70-25/91-02-01 and 70-25/91-02-02. However not withstanding these improved controls, one air sampler flow meter, out of a total

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of 30, was observed to be uncalibrated and without a calibration sticker during the July 1992 inspection.

Reason for Violation

The flow meter had been purchased and placed in storage by Nuclear Operations (Dept 642) some time in 1991, instead of by the Instrumentation group of Radiation Protection and Health Physics Services - RP&HPS (Dept 641/372). It was therefore not logged into RP&HPS's calibration data base, as were all other air sampler flow meters. RP&HPS's instrumentation technicians were therefore unaware of the flow meters existence.

During April 16, 1992 the flow meter was taken out of storage and attached to a remote air sampler (RAS) pump by a contract health physics technician to be used inside a tent in the Hot Lab service gallery. The H.P. techician was aware of the previous violation concerning air samplers but did not check to see if the flow meter had a calibration sticker attached.

During routine flow meter 6 monthly calibrations and pre-inspection checks of flow meter calibration status, the instrumentation technicians used a calibration data base printout as a check-off sheet. They checked off all the flow meters on their printout, but continued to be unaware of the existence of the uncalibrated flow meter. Facility HPs failed to notify instrumentation technicians of the additional air sampler during this time. In addition, pre-inspection walk-throughs by the facility H.P. failed to identify the uncalibrated air sampler flow meter.

Corrective Actions

a. Following discovery of the uncalibrated flow meter, it was immediately assigned a property number, logged into the calibration data base, calibrated, and a calibration sticker attached. The flow rate was within acceptable tolerance limits and the corrective action documented in an internal memo dated July 28. This memo and calibration record were shown to the inspector before his departure. No impact on worker health and safety occurred as a result of the uncalibrated flow meter

b. Air sampler airborne concentration data were also reviewed the same day and did not indicate any abnormal activities.

c. A search of all Hot Lab storage locations was made to identify any other out-of-use equipment and/or spares which did not have correct calibration stickers. None were found.

d. Instructions were given to Hot Lab H.P. technicians to only accept spares or replacement equipment from RP&HPS's instrumentation technicians, and to always check that new and/or spare equipment has a current calibration sticker.

e. All radiation safety related measuring equipment needing regular calibration shall be purchased by RP&HPS's instrumentation group to ensure better control and logging of new equipment into the calibration data base.

f. Procedure N001FD190002 "Function of the Radiation Instrument Services Laboratory" is being revised to document requirements (d) and (e) above. Estimated completion date is October 31, 1992.

g. Regular quarterly inspections of Hot Lab operations by the Radiation Safety Officer will be initiated to identify any similar future occurrences. Findings will be documented and corrective actions tracked. The first inspection was performed September 17, 1992.

2. Notice of Violation (Item 70-25/92-01-03)

During the inspection it was observed that several HEPA filter replacements had exceeded the required two year period. The service gallery filters had not been changed since July 1989 and the operating gallery filters had not been changed since January 1990. Hot Cell HEPA filters had been changed out within the past two years. Procedural and record keeping deficiencies were noted in the DOS testing of the filters, air change measurement and filter pressure drop measurement. In addition some HEPA filters had inadequate pressure drop meters.

Reason for Violation

The Service Gallery and Operating Gallery filters were not changed out within the two year limit and adequate documentation of ventilation system maintenance was not available due to the lack of a formal procedure requiring performance and documentation of routine inspection of facility safety systems. Installation of differential pressure gauges with insufficient span to meet requirements of the RIHL Radiation Safety Plan, document 173SRR000003, was due to inadequate training of operations personnel.

Corrective Action

a. Immediate action was taken to verify the ventilation system was providing the specified 6 changes of air per hour and the Operating and Service gallery HEPA filters were changed out. The 0-1 in. gauge reading full scale was immediately replaced with a 0-6 in. gauge and verified to have an acceptable differential pressure reading of approximately 1.1 in. of H_2O.

b. A facility "Critical Item Maintenance and Surveillance (M&S) draft procedure has been prepared to formalize the weekly inspection by D/642 of the HEPA ventilation system, the air-drop samplers, the liquid waste tank, and other facility personnel safety and environmental protection systems. The draft M&S procedure includes a check list of all items to be inspected and a requirement for trend analysis to identify system performance degradation.

c. Pressure differential (PD) gauges across the filter plenums (pre-filters and HEPA filters) will be standardized at 0-6 in. H_2O. The new gauges have been ordered through RP&HPS and when received, will be logged into the calibration data base, calibrated, calibration stickers applied, and installed on the filter plenums.

d. A review of the RIHL operational requirements and the facility HEPA filter change out requirements was conducted by RP&HPS and Nuclear Operations management and technical personnel. Based on that review, change out of filters, will in the future, be based on: (1) exceeding a DP of 3 in. of H_2O across the filter, (2) a radiation level at the surface of a plenum which exceeds 150 mR/h, (3) DOS testing of the cell filter indicates an unacceptable filter efficiency, (4) visual inspection of the filter indicates damage or excessive loading at the filter face. The requirements for filter change out every two years or a flow rate insufficient to provide six air changers per hour will be deleted from the facility Radiation Safety Plan (ECD 11/15/92). Neither requirement is required by the current or future facility operating mode or by the facility license. Only the hot cell HEPA filters will be DOS tested, since the level of contamination in the operating and service galleries is maintained below levels requiring posting as "contamination areas". HEPAs in these areas will nevertheless be maintained as "best management practice". The current Decommissioning Plan (Section 3.3.2.1, AI-78-19, September 1990) allows for ventilation system modification as the decommissioning progresses.

e. Personnel will be specifically trained in the implementation of the M&S procedure, (ECD for final issue 10/15/92).

3. Notice of Deviation (Item 70-25/92-01-02)

The license requires quarterly reviews of the radiation safety and environmental programs related to Hot Lab SNM-21 license activities. A prior inspection in 1990 had observed that these were delinquent and not being completed within the required 90 days following the end of the quarter. In response to that Notice of Violation (Rocketdyne letter 90RC-08723, July 17, 1990), Rocketdyne committed to a schedule to issue the delinquent reports and to issue future reports in a timely manner. This was done and resulted in a previous close out of 70-25/90-01-01. Subsequent inspections between 1990 and July 1992 had confirmed that these quarterly reports have remained current.

Reason for Deviation

At the time of the last inspection (July 27-30, 1992) the first quarter 1992 report was still in draft form and had not been formerly issued. It should have been issued by the end of June 1992 to meet the 90 day requirement.

Discussion with the inspector indicated that the scope and content of our quarterly reports far exceeded [illegible] he would consider an adquate review to meet the license requirement. Since the manhours involved in preparing the report was a major factor in the reports tardiness, it was agreed that the scope and data content of the report be reduced to facilitate a more timely completion.

Corrective Actions

a. The first quarter 1992 ALARA report was finally issued August 25th.

b. The second quarter 1992 ALARA report was issued September 9th, well within the 90-day issue period.

c. Data format and content of the report has been revised and automated such that existing computerized databases and spreadsheets can be easily and automatically generated for inclusion in the report. This has eliminated much of the time consuming manual data manipulation which had caused the ALARA review/report to be so time consuming. Current data content of the report is area (film badge) radiation exposures, area air sample data, breathing zone air sample data, stack sample data, personnel exposure data and bioassay data. Data eliminated from the report (but which is auditable directly from the routine weekly and monthly radiation survey reports) includes area contamination and radiation survey results. It is anticipated that it will now be easier to issue the report in a timely manner.

d. All corrective actions are now complete.

If you have any questions concerning the above material, please contact Phil Rutherford at (818) 586-6140.

Very truly yours,

SR Laffler - for

J. T. Nagamatsu, Vice President
Environmental, Health, Safety and Facilities

cc: Regional Administrator, NRC Region V
R. J. Pate, NRC Region V
M. Cillis, NRC Region V