

February 14, 1997

Mr. John Hermanson
Assistant Regional Administrator
for Federal-State Operations
Occupational Safety and Health
Administration
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Hermanson:

In accordance with the October 21, 1988, Memorandum of Understanding between the Nuclear Regulatory Commission (NRC) and the Occupational Safety and Health Administration (OSHA), I am enclosing information regarding two NRC licensees (the Braidwood Nuclear Power Plant near Braceville, Illinois, and Allied Signal, Inc., in Metropolis, Illinois) that may be of interest to your agency.

If you have any questions about the information provided, please contact Mr. Chuck Phillips at 815/458-2852 regarding the Braidwood information, or Mr. Robert Krsek at 630/829-9843 regarding the Allied Signal information.

Sincerely,

Orig. signed by Roland Lickus

Roland Lickus, Chief
State and Government Affairs

- Enclosures:
1. Non-Radiological Hazards
Data Sheet (Braidwood)
 2. Concerned Individual's
Documentation
 3. Non-Radiological Hazards
Data Sheet (Allied Signal)

cc w/encl 1: R. Borchardt, NRR
C. Phillips, RIII

cc w/encl 3: F. Combs, NMSS
R. Krsek, RIII

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Non-Radiological Hazards Data Sheet**Part I - Issue**

NRC Licensee: Allied-Signal, Inc.
Post Office Box 430
Metropolis, IL 62690

License #: SUB-526
Docket #: 040-03392

Description of Issue:

On tours of the Feed Materials Building (FMB) and fluorine production plant, inspectors noted that cigarette butts littered the floors, and operators casually smoked cigarettes during the course of normal operations throughout the FMB and fluorine production plant. Cigarette lighters, matches and lit cigarettes can all be classified as 'ignition sources'.

When asked about this practice, licensee officials pointed out that the NRC license does not require that smoking be controlled in restricted areas, and that smoking was forbidden onsite in a limited number of areas. Some of the areas highlighted were the Liquid Petroleum Gas tanks, and the paint spraying operations. The inspectors then further inquired about the prohibition of smoking around two specific operations: the ammonia dissociators and electrolytic cells.

Ammonia dissociators 'crack' ammonia creating a gaseous mixture of approximately 75% Hydrogen and 25% Nitrogen. This gas is then used in various operations throughout the FMB. Electrolytic cells take in hydrogen fluoride and create fluorine, which is the product gas and hydrogen, which is considered a waste gas. Cigarette butts in these areas were observed around the process equipment and the gas piping.

Inspectors also observed cigarette butts in areas where the smell of ammonia is typically present. Page 137, of the Allied Signal Metropolis Works Employee Safety handbook states, "No smoking is permitted in the presence of ammonia vapors."

The inspectors were concerned of the increased potential for fire or explosion due to the fact that the lighting and smoking of a cigarette is considered an 'ignition source', and that the licensee utilizes various hazardous chemicals throughout the plant.

It appears as though 29 CFR 1910.103, OSHA's standard for Hydrogen use, is not applicable to this site, as the hydrogen is not delivered, stored and discharged, but rather produced through chemical and mechanical reactions. But various National Fire Protection Association (NFPA) standards do cover the control of ignition sources; i.e. the National Electrical Code, which classifies hazardous chemicals, and then sets controls for the classes. Conversations with instructors at OSHA's Training Center also indicated that an issue such as this could be pursued through OSHA's General Duty Clause.

Also, it is worth noting that in many of the process buildings in the plant asbestos is used as fire

protection and insulation. The licensee does institute an asbestos program, and does perform ambient air asbestos monitoring. The inspector does not know the ambient level of asbestos in these buildings, if any. An OSHA Interpretation letter dated September 4, 1990 concerning 29 CFR 1910.1001, clarifies that workers are not considered occupationally exposed to asbestos only when there is no source of asbestos, i.e. no asbestos-containing materials in the building, no asbestos-related operations nearby, and no cross-contamination from other buildings near a worksite.

Finally, NFPA 801 "Facilities Handling Radioactive Materials", applicable to all NRC licensees, states under 2-4(g), in part that a written fire protection plan shall include the following "The restriction of smoking to properly designated and supervised areas of the facility.

How Issue was Identified: Inspectors identified the issue during facility tours and process walkdowns.

Licensee Representative Informed:

Matthew Kosmider Plant Manager 01/10/97

Licensee Comments:

It appeared to be a grey area in the OSHA regulation, and they would be looking into it. Also, they noted that an incident has never occurred onsite where smoking was the root cause.

Other Persons Informed:

Marshall Shepherd Director Regulatory Affairs
Hugh Roberts Site Safety Supervisor


Robert G. Krsek

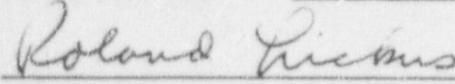
01/22/97
Date

Part II - Follow up

OSHA informed Yes No

Date informed _____

Person Contacted LETTER TO J. Hermanson, OSHA Region V


Roland Dickins
NRC OSHA Liaison Officer