

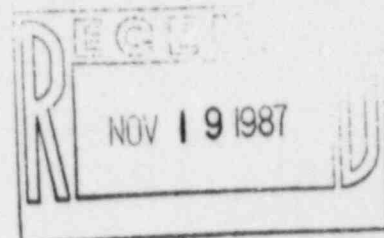


United States Department of the Interior

GEOLOGICAL SURVEY
BOX 25045 MS. 424
DENVER FEDERAL CENTER
DENVER, COLORADO 80225
Branch of Geochemistry

November 16, 1987

U.S. Nuclear Regulatory Commission, RIV
Attention: Mr. Lawrence A. Yandell, Chief
Radiological Protection and Safeguards Branch
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 96011



Subject: Reply to Inspection Report 50-274/87-01
Docket No.: 50-274
License No.: R-113

Gentlemen:

This letter refers to the subject Inspection Report. Attachment A is the reply to the Notice of Violation, and Attachment B is the reply to the Notice of Deviation.

In accordance with 10CFR 2.790(d), it is requested that our reply to the Notice of Violation, attachment A, be withheld from public disclosure.

Should you have further questions, please contact me.

Sincerely,

Dr. Hugh T. Millard, Jr.
Reactor Administrator

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November 16, 1987

Reply to Notice of Deviation

Attachment B

U.S. Geological Survey
Docket: 50-274
License: R-113

1. Development of management approved instructions and procedures.

Written procedures and instructions for collecting, shipping, and handling low-level radioactive waste were prepared and in our files in accordance with 1E Bulletin No. 79-19 as addressed in our response to the Director dated September 25, 1979.

It was our understanding at that time that our Radiological Advisory Committee would provide the management approval that was needed to be in compliance. This procedure will be upgraded by:

- a.) Reviewing and updating our procedures as necessary.
- b.) Submitting the procedures for management approval.
- c.) Preparing a cover sheet for appropriate signatures.

2. Provide training and periodic retraining of personnel.

The provision of training and periodic retraining in DOT and NRC regulatory requirements has been met by sending the Reactor Health Physicist to meetings regarding the handling and disposal of low-level waste. The Reactor Health Physicist is responsible for the collection, storage, and shipment of radioactive waste that is generated within the reactor facility. There are approximately six (6) experimenters who handle radioactive samples, do chemistry, etc. which create waste. Each person contacts the reactor H.P. when waste is ready for disposal. This procedure will be upgraded in the following manner:

- a.) Provide an annual retraining course outlining procedures for safe handling of radioactive wastes.
- b.) Provide a sign-off sheet for attendees.

3. Implement a management controlled audit function to ensure compliance with requirements. An audit will be conducted annually by the Radiological Advisory Committee of the requirements of 1E Bulletin No. 79-19. Minutes of the meetings are maintained by the Central Region Health Physicist.

Compliance with the above commitments will be within 30 days from the date of this letter.



United States Department of the Interior

GEOLOGICAL SURVEY
BOX 27006 MS 424
DENVER FEDERAL CENTER
DENVER, COLORADO 80225
Branch of Geochemistry

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December 16, 1987

U.S. Nuclear Regulatory Commission, RIV
Attention: Mr. Russell Wise
Radiation Specialist
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 96011

Subject: Revised Reply to Inspection Report
50-274/87.01
Docket No.: 50-274
License No.: P-113

Dear Mr. Wise:

This letter is in response to your telephone conversation with Mr. Rusling and Mr. Smith of our staff on December 3, 1987. A revised reply to the Notice of Deviation is attached. If you wish to receive a copy of the revised procedures, please advise us.

Should you have further questions, please contact Mr. Rusling or Mr. Smith.

Sincerely,

Dr. Hugh T. Millard, Jr.
Reactor Administrator

Enclosure

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Revised Reply to Notice of Deviation

December 16, 1987

U.S. Geological Survey
Docket: 50-274
License: R-113

1. Development of management approved instructions and procedures.

Procedures were written in September, 1979, for the handling of low-level radioactive waste. The procedures were approved by the Radiological Advisory Committee. At that time, we believed the procedures were adequate. During the recent inspection, it was pointed out to us that the procedures did not contain a cover sheet with management signatures, and that the procedures lacked sufficient detail, particularly regarding the disposal of demineralizer resin which is the major waste produced in the reactor facility.

The following actions will be or have been taken:

- a.) The procedures have been revised.
- b.) The procedures have received preliminary approval of the Radiological Advisory Committee and they will be submitted for final approval.
- c.) A cover sheet for appropriate signatures will be prepared.

2. Provide training and retraining of personnel.

Training and periodic retraining in DOT and NRC regulatory requirements have been provided to the Reactor Health Physicist; however, retraining for the reactor staff in the procedures for handling low-level radioactive waste has not been conducted. We relied on the supervision of the Reactor Health Physicist who had been assigned responsibility for the handling and disposal of the waste.

The following actions will be taken:

- a.) An annual retraining session covering the procedures for safe handling of radioactive wastes will be implemented.
- b.) A sign-off sheet for attendees will be provided.

3. Implement a management controlled audit function to ensure compliance with requirements of 1E Bulletin No. 79-19.

The Radiological Advisory Committee has reviewed the waste disposal activities on an annual basis; however, the review concentrated on the shipping and storage activities, and it did not deal adequately with the required training activities.

The following action will be taken:

An annual audit by the Radiological Advisory Committee of the requirements of 1E Bulletin No. 79-19 will be implemented. Minutes of the meetings are maintained by the Central Region Health Physicist.

Compliance with the above commitments will be within 30 days from the date of this letter.