



ITT Corporation

Rec'd by  
Teletype  
3/9/88

Aerospace / Optical Division

3700 E. Pontiac Street  
P.O. Box 3700  
Fort Wayne, IN 46801  
(219) 423-9838

March 9, 1988

Mr. Hugh Thompson, Director  
Office of Nuclear Material Safety  
and Safeguards  
Nuclear Regulator Commission  
Washington, D.C. 20005

Dear Sir:

Subject: Request For Relaxation of NRC Order Dated 18 February 1988  
(3M Nuclear Static Eliminator)

Pursuant to your order dated 18 February 1988, ITT Aerospace/Optical Division has discontinued the use of all 3M brand nuclear static elimination devices. We request you favorably consider a relaxation of the above order for good cause as set forth below.

ITT A/OD is sole supplier of the Army SINCGARS radio. This high priority defense communication system is essential to the national defense and A/OD is working overtime shifts in order to meet the critical schedule established by the Department of the Army.

The static elimination devices are necessary to insure the highest reliability standards are maintained. As you can fully appreciate, a malfunctioning radio in a hostile situation can be life-threatening.

If A/OD is unable to utilize the 3M static eliminators until suitable replacements can be acquired, serious economic consequences may result. It is anticipated that approximately seven to 10 days will be required to replace the devices. If A/OD is unable to use the 3M devices for any appreciable period of time, a decision will have to be made to provide less reliable, though contract compliant radios or to shut down production. A production shutdown would cause more than a day for day delay in fielding the radios and would have a severe economic impact for A/OD, the U.S. Army and the 168 employees who have been identified for potential layoff. Such a layoff would come at a time when we are attempting to hire an additional 400 employees this year in order to meet the Army SINCGARS requirements. A layoff would adversely impact upon our ability to hire the necessary workforce.

An NRC recommended consultant, Standard Nuclear Consultant, is on site today making wipe tests to insure that no 3M devices are used in our application, have caused contamination or pose a health hazard.

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PDR ORG EMVJMCU  
PDR

Mr. Hugh Thompson

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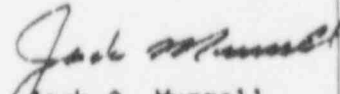
We would intend only to use devices that have passed such tests as the health and well-being of our employees are of paramount concern and consideration.

Therefore, pursuant to Section IV of your Order dated 18 February 1988, we request that you permit ITT A/OD to utilize the 3M static eliminators solely for the manufacture of SINCGARS radios until suitable replacements have been obtained and upon the condition that said devices have been thoroughly screened, tested, and determined to pose no health or safety threat by a consultant approved by the NRC.

We urgently request that you expedite your decision and notify the undersigned by FAX at 219-487-3062.

If you are in need of additional information, please call me at 219-487-3043. Your cooperation and thoughtful consideration in this matter is truly appreciated.

Sincerely,

  
Jack O. Murrell  
General Counsel

ag

88-3100-001

recd 11 Mar 1988; 13-167

STATUS OF 3M STATIC ELIMINATOR FAILURE INCIDENT  
(Weekly Report for period ending March 10, 1988)

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Of the 3M static elimination devices that were in use in February, about 15% have been returned as a result of the Order by the NRC. The return rate is higher (about 50%) for devices in the food, beverage, pharmaceutical, and cosmetic applications because of the Order of February 5, 1988. About 4% of the returned devices have been found to be leaking.

Regional Offices have received about 30 written requests for exceptions for continued use. Two requests have already been approved on the basis of workplace safety, and the other requests are being acted on. Statistics are not yet available on the number of requests for exceptions received by Agreement States. The Agreement State of California has approved two exceptions to the NRC Order to General Licensees dated February 18, 1988. We have been informed that several large users having a broad specific license are now using their 3M static elimination devices under that license rather than under a general license.

3M has programmed their computer for providing data to Region III. The program is in the final stages of debugging. The first report was issued to Region III at 10:25 a.m. on March 10, 1988.

The regulatory impact to date for NRC and state personnel has been estimated at seven FTE's.

DISTRIBUTION: March 11, 1988

H. Thompson, Jr.

R. Bernero

R. Cunningham

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Region II - John Potter

Region III - Bruce Mallett

Region IV - William Fisher

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S. Baggett

P. Vacca

D. Cool

J. Long

MAR 11 '83 16:19 NRC RI DRSS

P01

recd 11 Mar 83; 1410E

SE 316

FACSIMILE REQUEST

23334

Date

3/10/88

Cy to  
Justin Long  
Send this  
out to  
V. Miller

MESSAGE TO:

Colon Sjodum, NMSS

TELECOPY NUMBER:

492-0259

NUMBER OF PAGES:

4

INCLUDING THIS REQUEST FORM

MESSAGE FROM:

Jim Joyner

U.S.N.R.C. REGION 1

KING OF PRUSSIA, PENNA.

TRANSMITTED BY:

JCH

DATE & TIME:

3/10/88, 1510

VERIFIED BY:

Colon - a memo summarizing the analyses of Black Dog product samples is attached.

In addition, 9 samples of Coca Cola obtained in Mass. were analyzed by LNEZ. Any positive results were with the analytical C.E.

We also obtained empty cans from the Philadelphia Canadevery facility, but no product was in the cans. Wipes of the can interiors, and pieces cut from the cans, were all clean.

No other product samples were obtained.

Jim