

Babcock & Wilcox

a McDermott company

July 2, 1986

Research & Development Division
Lynchburg Research Center

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Standardization and Special Projects Branch
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Reference: License No. CX-10, Docket No. 50-13

Subject: Organization Change

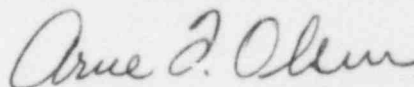
Gentlemen:

My letter dated August 7, 1984, forwarded the Dismantling Plan for the CX-10 Reactor, dated July, 1984. Since that time there has been a re-organization at the Lynchburg Research Center that affects the dismantling plan.

A revised Section 8 of the plan is attached. Changes are indicated by vertical lines in the right-hand margin.

Very truly yours,

BABCOCK & WILCOX
Lynchburg Research Center



Arne F. Olsen
Senior License Administrator

jhc
Attachment
pc: NRC, Region II

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8.0 Administrative Requirements

8.1 Technical Specification

The technical specifications for the CX-10 facility have not been designated, in as much as the facility was licensed for operation prior to January 16, 1969. As specified in 10 CFR 50.36(d)(1), the technical specifications shall be deemed to include the entire safety analysis report as technical specifications. These technical specifications address the safety of the facility during operation and will no longer be applicable for the operations specified in this plan. Therefore, subsequent to the removal of the fuel from the facility and transfer of the Am-Be sealed sources, the technical specifications shall be replaced with the requirements specified in this plan.

8.2 Organization

Figure 8-1 is the organization chart for the Lynchburg Research Center (LRC) as it applies to the CX-10 Decommissioning project.

- 8.2.1 Manager, Lynchburg Technical Operations - The Manager, Lynchburg Technical Operations has overall authority and responsibility for all operations at the Lynchburg Research Center. He is appointed by and reports to the Vice President, Research and Development Division.
- 8.2.2 Manager, Decommissioning - The Manager, Decommissioning is responsible for managing the dismantling and decontamination activities associated with the CX-10 decommissioning, retaining the necessary records, preparing all required reports and controlling the project expenses. The Manager, Decommissioning is appointed by and reports to the Vice President, Research and Development Division.
- 8.2.3 Manager, Facilities and Quality Assurance - The Manager, Facilities and Quality Assurance has overall authority and responsibility for the administration of the Quality Assurance program within the Research and Development Division. He is appointed by and reports to the Vice President, Research and Development Division.

- 8.2.4 Manager, Quality Assurance - The Manager, Quality Assurance has the authority and responsibility for the implementation of the Quality Assurance program within the Research and Development Division. He is appointed by and reports to the Manager, Facilities and Quality Assurance.
- 8.2.5 Quality Assurance Administrator - The Quality Assurance Administrator implements the Quality Assurance program at the Lynchburg Research Center. He reports to the Manager, Quality Assurance and is independent from all operations at the Lynchburg Research Center. He shall be responsible for reviewing and approving Quality Assurance program plans. He performs vendor audits and audits LRC projects for compliance with approved QA program plans. He shall administer the technical procedure program.
- 8.2.6 Safety Review Committee - The Safety Review Committee (SRC) is comprised of at least five senior technical members appointed by the Manager, Lynchburg Technical Operations. The membership shall be constituted of no more than 75% from the LRC. There shall be one member representing LRC management who will act as the committee coordinator. The combined experience of the members includes reactor operations, reactor engineering, health physics radiological safety, licensed material handling and chemistry. Specialized consultants are also available to the SRC. The Facility Supervisor shall determine the items that come before the committee.

The following are examples of items that require SRC approval:

- a. Any change requiring a license amendment.
- b. Any new process which involves the use of licensed material.
- c. Any change of a technical specification.
- d. Any change, test, or experiment pursuant to a reactor license involving an unreviewed safety question as defined in 10 CFR 50.59(c).

The Committee also has the following functions:

- a. Review general procedures for handling and using licensed material.

- b. Review procedures for the acquisition and disposal of licensed material.
- c. Review procedures for maintaining an accurate inventory of licensed material.
- d. Review procedures for the control of radiation and the protection of personnel from radiation exposure.
- e. Review procedures and proposed projects for fire safety and fire prevention considerations.
- f. Review any changes in the foregoing procedures that require a significant deviation from established procedures before the changes are instituted.
- g. Review abnormal occurrences as defined in appropriate reactor licenses.
- h. Review proposed experiments and tests at the reactor and critical experiment facilities which are significantly different from those previously performed at the facilities.
- i. Provide the LRC with general consulting services in the field of radiation protection and radioactive materials handling.

Committee approval of new processes and practices prior to the writing of procedures will be occasionally necessary due to the experimental nature of the work performed at the LRC. In these instances, the Committee will review, with those responsible for the safe operation of the process or practice, the potential hazards and philosophy of operation. The approval by the Committee shall constitute approval to perform the work without written procedures. The SRC shall meet four times annually. A quorum shall consist of a majority of the membership.

8.2.7 Facility Supervisor - The Facility Supervisor is appointed by and reports to the Manager, Lynchburg Technical Operations. He shall demonstrate to Company management proficiency in the application of good principles of radiation protection, industrial safety and nuclear criticality safety as related to activities at the LRC. He shall be responsible to the Manager, Lynchburg Technical Operations for the safe conduct of all operations at the LRC and for assuring that these operations are conducted in accordance with all license conditions. He shall also be responsible for reviewing and approving all area operating procedures.

- 8.2.8 Manager, Safety and Licensing - The Manager, Safety and Licensing is appointed by and reports to the Manager, Lynchburg Technical Operations. The Supervisor, Health and Safety, the License Administrator, and the Accountability Specialist report to him.
- 8.2.9 License Administrator - The License Administrator shall have a B.S. degree in science or engineering and three year experience in nuclear technology or an A.S. degree in science or nuclear technology and 12 year experience in nuclear technology. The License Administrator reports to the Manager, Safety and Licensing.

The License Administrator shall be responsible for administering the LRC licenses. He shall be the primary liaison with the NRC and other federal, state and local agencies regarding nuclear matters. He is the coordinator of the Safety Review Committee and is the management representative on the SRC. He is the chairman of the Safety Audit Subcommittee and is the Facility Supervisor. The License Administrator is the LRC's internal auditor for regulatory compliance.

- 8.2.10 Accountability Specialist - The Accountability Specialist reports to the Manager, Safety and Licensing. He is responsible for maintenance and retention of the SNM accountability records, preparing and transmitting required reports.
- 8.2.11 Supervisor, Health and Safety - The Supervisor, Health and Safety is appointed by and reports to the Manager, Safety and Licensing. The supervisor shall have a B.S. degree in a technical field and professional experience in assignments involving radiation protection at a supervisory level. He shall have five years experience and demonstrated proficiency in the application of radiation safety principles and be knowledgeable in the fields related to radiation protection.
- His duties include supervising the activities of the Industrial Safety technician and the Health Physics Engineers.

8.2.12 Health Physics Engineer - The Health Physics Engineer shall be appointed by and report to the Supervisor, Health and Safety. He shall have a B.S. degree with course work in Health Physics. His responsibilities include:

- a. Performing area surveys.
- b. Administering the air survey program.
- c. Administering the respiratory protection program.
- d. Administering the bioassay program.
- e. Leak testing sealed sources.
- f. Supervising shipping and receiving of radioactive materials.
- g. Supervising and coordinating the waste disposal program
- h. Assisting in personnel, equipment and facility decontamination.
- i. Conducting radiation safety training.
- j. Providing expertise in all aspects of radiation protection.
- k. Generating, maintaining and distributing records and reports required by regulations and procedures pertinent to the group's activities.
- l. Distributing and processing personnel monitoring equipment.

8.2.13 Survey Monitors - Survey Monitors are technicians trained in the performance of radiation and contamination surveys. They report to the Manager, Decommissioning for their day-to-day work assignments and administratively to the Health Physics Engineer. They shall perform surveys and generate required records.

8.2.14 Technician, Industrial Safety - The Industrial Safety Technician shall be appointed by and report to the Manager, Safety and Licensing. He shall have one year of experience in radiation and industrial safety. He shall be familiar with the codes and requirements of OSHA and NFPA. His responsibilities shall include:

- a. Administering the Industrial Safety Program.
- b. Reviewing proposed facility changes to insure fire safety.
- c. Providing expertise in fire prevention to the Facility Supervisor and Safety Review Committee.
- d. Performing tests, inspections and maintenance of fire protection, control and extinguishing equipment.
- e. Provide training for the LRC Fire and Rescue Team.

f. Conducting safety inspections.

- 8.2.15 Manager, Facilities - The Manager, Facilities shall be appointed by the Manager, Facilities and Quality Assurance. His duties include the supervision and direction of two groups; Office Services and Plant Engineering. He assists in planning and coordinating work for other departments involving Facilities personnel and outside contractors.

Other responsibilities include assisting technical sections in planning and designing systems and facilities to carry out their objectives, and recommending, designing, estimating, and supervising new construction and modifications to existing structures and systems.

- 8.2.16 Supervisor, Plant Engineering - The Supervisor, Plant Engineering is appointed by and reports to the Manager, Facilities. His duties include supervising the activities of the custodians, two groups of maintenance personnel, and contractors.

- 8.2.17 Decommissioning Foreman - The Decommissioning Foreman is appointed by and reports to the Manager, Decommissioning. The foreman directs the day-to-day activities of the work crew. The foreman is trained and experienced in the safe handling of radioactive material.

- 8.2.18 Technical Support - The two technical laboratories provide personnel and facilities to support the decommissioning project on an as needed basis. This support includes data interpretation, development of measurement techniques, performing special measurement tasks, and report writing.

Figure 8-1

