AlliedSignal

AlliedSignal Inc.
Nuclear/Fluorine Specialties
Route 45 North
P.O. Box 430
Metropolis, IL 62960 USA

618 524 2111
618 524 6239 Fax

January 22, 1999

Certified Mail:
z-514-977-593

Director, Office of Nuclear Material Safety
And safeguards (NMSS)
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Re: Reply to a "Notice of Violation"
Docket No.: 040-03392
License No.: SUB-526

Dear Sirs:

This letter is our response to the "Response To A Notice of Violation", NRC Inspection Report No. 040-03392/98-006 (DNMS), dated January 5, 1999.

1. **Violation No. 040-3392/98-006-02**

License Condition 10, of Source Materials License SUB-526 authorizes the use of licensed materials in accordance with the statements, representations, and conditions in Chapters 1 through 7 of the license application dated July 11, 1994, and supplements and revisions thereto.

Chapter 2, Section 2.6, "Operating Procedures", of the supplement dated September 1, 1996, requires, in part, that plant written procedures shall be implemented in accordance with Plant Policy titled "Procedure Control Policy".

The "Departmental Procedure Section" of the "Procedure Control Policy" dated October 15, 1993, stated, in part, that departmental procedures (Health Physics Procedures) describe the accepted and approved method of accomplishing a task or activity.

Health Physics Procedure, "Contamination Control", Paragraph 1.3, required, in part, that (process) leaks which result in a visible accumulation of uranium on equipment, or the floor, require immediate decontamination and activation of the respirator warning lights (beacons).

Contrary to the above, on November 30, 1998, plant operations staff did not conduct immediate decontamination activities of visible accumulation of uranium on various pieces of process equipment and on several immediate floor areas adjacent to the affected process equipment in the Feed Materials Building and did not activate the respirator warning lights (beacons).

270022



1/0

IE07

**Reason For The Violation:**

Operation personnel failed to adequately vacuum up a small uranium tetrafluoride ($UF_4$) on top of the $UF_4$ blender and at the north end of the ore dryer. Both of these spills were caused by mechanical seal failures which would require production personnel to provide additional visual equipment inspection and additional decontamination activities until repaired by maintenance personnel. Due to the large particle size of the material, it would not require activating the respirator warning lights for either of these spills.

**Corrective Action(s):**

- Production personnel will be reinstructed to provide additional decontamination of floors and equipment where spills or leaks have occurred due to mechanical seal failures.

- The Health Physics Procedure "Contamination Control", Paragraph 1.3, will be changed to include a visual inspection by the FMB foreperson and the Health Physics Department. They will be responsible for determining if the spill or leak requires immediate decon. This visual inspection will be required to determine the size of the spill, location, type of material, and size of the area affected. Observation of the air targets will aiso aid in the determination if the spill is airborne and the respirator lights are activated. Spills that are not airborne due to the particle size would require respirators for personnel involved in the decontamination but not for all personnel entering the floor.

**Completion Date:**

To be completed prior to February 28, 1999.

If you have any additional questions, please call Mr. M. L. Shepherd at 618-524-6238 or Mr. H. C. Roberts at 618-524-6349.

Sincerely,

J. William Lessig
Plant Manager

JWL/sm

cc: R. Preziotti
M. Shepherd
H. Roberts
J. Graham – ConverDyn

U. S. Nuclear Regulatory Commission
Attention: Chief Fuel Cycle Branch
U. S. NRC, Region III
801 Warrenville Road
Lisle, IL 60532-4351

U.S. Nuclear Regulatory Commission
Attention: Mr. Philip Ting, Chief Operations Branch
Division of Fuel Cycle Safety & Safeguards, NMSS
Washington, DC 20555