

APR 14 1987

APPENDIX A  
NOTICE OF VIOLATION

General Electric Company  
Wilmington, North Carolina

Docket No. 70-1113  
License No. SNM-1097

During the Nuclear Regulatory Commission (NRC) inspection conducted on October 6-10, 1986, a violation of NRC requirements was identified. The violation involved a failure to provide for participation of local volunteer fire departments in on site emergency drills on an annual frequency. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violation is listed below:

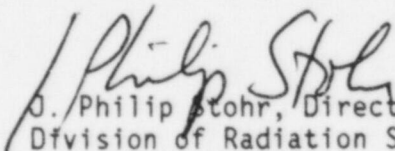
Condition 9 of Special Nuclear Materials License No. SNM-1113 requires that licensed material be used in accordance with statements, representations, and conditions contained in Part I of the licensee's application dated May 14, June 20, October 23, November 12, November 20, and December 3, 1984; February 6, and July 12, 1985, and March 26, 1986, and licensee letters dated December 19, 1984; July 10, and July 30, 1985. Chapter 8, Part I, Emergency Plan, of the application requires that the licensee will maintain a capability for handling emergencies in accordance with the Radiological Contingency and Emergency Plan. Section 7.2, Table 7.1-7 of the Radiological Contingency and Emergency Plan states that retraining for local fire companies will include an annual exercise.

Contrary to the above, the licensee has not provided for annual participation of the local fire departments in any on site drills.

This is a Severity Level V violation (Supplement VIII).

Pursuant to the provisions of 10 CFR 2.201, General Electric Company is hereby required to submit to this Office within 30 days of the date of the letter transmitting this Notice a written statement or explanation in reply including: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

  
J. Philip Stohr, Director  
Division of Radiation Safety  
and Safeguards

Dated at Atlanta, Georgia  
this 23rd day of January, 1987

8704300224 870414  
PDR ADOCK 07001113  
C PDR

APR 14 1987

## APPENDIX B

### OPERATIONAL SAFETY ASSESSMENT WEAKNESSES

Based on the results of the NRC's operational safety assessment of the General Electric Nuclear Fuel Plant conducted on October 6-10, 1986, the following weaknesses were identified (references are to sections in NRC Inspection Report 70-1113/86-22):

1. There is a lack of management controls in the area of procedure change reviews and documentation, incident investigations and followup activities (5.a).
2. Operating procedures often lack specificity in the area of safety steps or comments as to why the safety steps are needed (5.b).
3. There were no positive nuclear criticality safety controls for placing uranium contaminated materials in 4-foot cubic waste boxes. (6.e(2)).
4. Weaknesses in the fire protection program were observed associated with:
  - a. Lack of an adequate fire prevention/control training program (7.b(1)).
  - b. Lack of specification of qualifications and assignment of responsibility for fire protection personnel (7.b(2)).
  - c. Inadequacies in the fire protection maintenance, testing and inspection program (7.c).
  - d. Inadequacies in the development and implementation of a training program for the fire brigade (7.d(3)).
  - e. Failure of the fire brigade to use proper manual fire fighting methods (7.d(5)).
  - f. Failure to conduct fire drills in a manner consistent with industry practice (7.d(5)).
  - g. Lack of adequate manual equipment to mitigate potential site fire hazard conditions (7.d(6)).
  - h. Discrepancies in fire protection systems relating to fire control capability (7.e).
5. There was a lack of adherence to safety precautions and controls when servicing process equipment (8.c).
6. Certain important equipment and controls in the Fuel Manufacturing Operation building (FMO) and the Fuel Manufacturing Operation Extension building (FMOX) are not treated as essential equipment from a calibration, maintenance and surveillance standpoint (9.a).

Appendix B

7. Certain accident potentials were not evaluated in detail with special emphasis placed on administrative and engineered controls necessary to mitigate the consequences of such accidents, e.g., the storage of uranium hexafluoride cylinders and propane tanks (10.a, 10.c, 10.d).
8. Weaknesses in the emergency preparedness program were observed associated with:
  - a. Lack of detail in the RCP in the area of offsite agency coordination and training (11.b).
  - b. The method of classifying emergencies in the Radiological Contingency Plan (RCP) not conforming to standard industry practice as delineated in NUREG-0762, "Standard Format and Content for Radiological Contingency Plans for Fuel Cycle and Materials Facilities", (11.c).
  - c. Discrepancies between elements of the RCP and the elements or features identified in RCPs at other nuclear facilities (11.g).



APR 14 1987

## APPENDIX C

### OPERATIONAL SAFETY ASSESSMENT IMPROVEMENT ITEMS

Based on the results of the NRC's operational safety assessment of the General Electric Nuclear Fuel Plant conducted on October 6-10, 1986, the following items should be considered for improvement of the operational safety program at this facility (references are to sections in NRC Inspection Report 70-1113/86-22):

1. Establishing criteria for review of procedural changes in order to make better use of procedural change review system (5.a).
2. Ensuring proper training of key personnel in nuclear criticality procedures (6.e(2)).
3. Establishing maximum enrichment allowed in uranium process management process (UPMP) as an automatic engineering control (6.e(2)).
4. Controlling the use of non-fire retardant wood in the uranium process area (7.a).
5. Establishing a fire prevention inspection program which complies with nuclear industry standards (7.a).
6. Improving loss prevention inspection of welding, cutting, and grinding operation (7.a).
7. Establishing a fire watch training program for individuals associated with welding, cutting, and grinding (7.a).
8. Maintaining adequate number of fire brigade members on each production shift (7.d(1)).
9. Including an evaluation of cardiac function during medical examination of fire brigade members (7.d(2)).
10. Developing fire emergency plans which provide fire fighting guidance to the fire brigade for the various process areas (7.d(4)).
11. Implementing a comprehensive fire protection program which will minimize the potential fire risk to radioactive waste material stored outdoors (7.e).
12. Conducting annual audits of the chemical safety program (8.a).
13. Modifying computer programs used for calibration scheduling in order to accommodate more than one calibration frequency (9.a).
14. Correcting calibration "due date" records (9.a).
15. Evaluating procedural requirements and practices concerning "extension" of calibration dates (9.a).

Appendix C

2

16. Improving overall recordkeeping pertaining to calibration (9.a).
17. Implementing vendor recommendations for preventive maintenance of diesel generator (9.b).
18. Including inspection of electrolyte level in maintenance checks for batteries (9.b).
19. Improving log entries pertaining to maintenance activities (9.b).
20. Improving recordkeeping relating to vendor service manual (9.b).
21. Identifying passive interlocks and developing a periodic functional testing program (9.c).
22. Identifying active interlocks and developing a periodic functional testing program (9.c).
23. Resolving the out of date calibration of two radiation monitors at the offsite medical facility (11.b).
24. Modifying the Notification of Unusual Event Class (or equivalent) to be notifiable within 15 minutes (11.c).
25. Clarifying notification procedures to define "immediate" notification (11.c).
26. Developing and implementing a standard notification procedure including a standard message form (11.c).
27. Making provisions for authenticating emergency messages (11.c).
28. Describing the backup communication system for notifying offsite agencies (11.c).
29. Providing a quarterly update of the emergency call list (11.c).
30. Including Carolina Power and Light (CP&L) on the emergency call listing (11.c).
31. Updating Emergency Control Center (ECC) library and emergency procedures to include location and number for UPMP facility fire alarm boxes (11.d).
32. Making provisions for performing computerized dispersion calculations in the ECC (11.d).
33. Including in procedures a correlation of UF6 dispersion results and public hazard potential to facilitate making protective action recommendations to offsite agencies (11.d).
34. Specifying in the Radiological Contingency Plan (RCP) or procedures the location of portable radios used by emergency teams (11.d).

## Appendix C

3

35. Providing for monthly operability tests of emergency communication equipment (11.d).
36. Making provisions for a formal inventory program of all on site medical units (11.d).
37. Adding tamper indicators to emergency kits (11.d).
38. Including in the RCP a description of content and location of all emergency equipment and kits (11.d).
39. Modifying evacuation instructions to indicate to visitors the need for a calm and timely evacuation (11.e).
40. Training of interim Emergency Directors such that they understand their offsite notification responsibilities (11.e).
41. Training of Emergency Medical Technicians (EMT) concerning radiological hazards (11.e).
42. Formalizing the annual program for updating and retraining of emergency personnel on pertinent aspects of the RCP (11.e).
43. Ensuring annual participation in drills by members of the survey, reentry, and damage control teams participating in annual emergency drills (11.e).
44. Clarifying the descriptions in the RCP of all important emergency staff assignments and corresponding responsibilities (11.f).
45. Expanding the written responsibilities of the Emergency Director to reflect the full range of responsibilities given to the position (11.f).
46. Indicating the minimum staffing levels for each functional areas on site (11.f).
47. Improving the method for distributing RCP updates to ensure intended recipient actually receives RCP update (11.f).