



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

JAN 21 1986

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MEMORANDUM FOR: James M. Taylor, Director  
Office of Inspection and Enforcement

FROM: Robert D. Martin  
Regional Administrator

SUBJECT: INDUSTRIAL SAFETY

As a followup to Vic Stello's concern about matters regarding industrial safety, which he expressed during the January 13 conference call, I am providing you, in the attachment, with random examples identified by my staff where our program and associated activities take us into industrial safety areas.

Please do not hesitate to call me if you have any questions regarding the information we have provided.

*Robert D. Martin*  
Robert D. Martin  
Regional Administrator

Attachment:  
As stated

- cc: T. E. Murley, RA, RI
- J. N. Grace, RA, RII
- J. G. Keppler, RA, RIII
- J. B. Martin, RA, RV
- J. H. Sniezek, DEDROGR
- P. S. Check, RIV
- E. H. Johnson, RIV
- R. L. Bangart, RIV

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Attachment

Tabulated below are examples of where our program and associated activities take us into the area of industrial safety:

1. OIE Manual

MC 1007 "Interfacing Activities Between Regional Offices and OSHA" (6/18/64) - Establishes method for communicating occupational safety and health information between regional offices and OSHA. Paragraph 04.03 provides notification guidance.

MC 1120 "Criteria for Issuing a Preliminary Notification" - Section 07q. speaks to a reportable event that involves a serious injury or fatality at a licensed facility including nuclear power plants under construction.

IP 71707 "Operational Safety Verification" (4/10/85) - This IP requires the inspector to conduct facility tours on a systematic basis with specific attention given to plant housekeeping conditions/ cleanliness, fire hazards and fire fighting equipment. ? SR

A survey of resident inspectors revealed several examples of industrial safety-type items they identified during plant tours that were called to the attention of plant management. Some examples include:

- Unnecessary storage or presence of combustible materials; e.g., trash, lumber, oils or fuels, in various operating spaces. ? SR
- Failure to use face or eye protection when required.
- Expired certifications of elevator inspections.
- Unsecured gas cylinders. ? SR
- Accumulation of water on floor which creates slipping hazard.
- Concern in the handling of Hydrazine.
- Failure to provide railings.
- Missing floor panels and grating.
- Improper placement of furniture and/or equipment which would restrict access to fire exits.
- Failure to post fire watches during welding and cutting operations. SR

- Failure to provide protective guards around rotating equipment.
  - Concern about Methol Ethyl Ketone (MEK) in sump drains (ANO 3/81).
  - Failure to use grounding straps.
  - Concerns regarding improper rigging.
  - Inadequate ventilation during major maintenance or modification work activities.
  - Failure to wear ear protection in posted areas.
2. IE Information Notice No. 85-87: "Hazards of Inerting Atmospheres" speaks to the hazards to personnel from oxygen-deficient atmospheres; e.g., entering inerted vessels, tanks.
3. NUREG - 0041: "Manual of Respiratory Protection Against Airborne Radioactive Materials." Pages 1-2 speaks to concurrent hazards that must be considered such as oxygen-deficient atmosphere and the necessity of selecting breathing equipment that protects against both radioactive material and furnishes an adequate supply of breathing quality air.
- Health Physics personnel are particularly alert to the hazards associated with entry into cubicles that are or have been inerted and would be deficient of oxygen.
4. Good Practices: (Not specifically addressed in NRC Program.)
- Inspectors involved with physical plant security have brought the following industrial safety-type items to the licensees attention in the interest of the employees' health and safety:
    - Gun safety/gun range safety.
    - Ear and eye protection relating to guard functions.
    - Scheduling of overtime for guards as it relates to fatigue and workload.
    - Availability of self-contained breathing apparatus for guards.
    - General condition of walkways as it pertains to the safe and rapid movement of personnel throughout the plant.