



Nuclear Fuel & Components Manufacturing
General Electric Company
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February 22, 1989

US Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: REPLY TO NOTICE OF VIOLATION

Reference: (1) NRC License SNM-1097, Docket 70-1113
(2) NRC Inspection Report 70-1113/88-18 dated 1/27/89,
received 2/2/89

Thank you for your letter reporting the results of the inspection conducted at our licensed fuel fabrication plant by Messrs. G. B. Kuzo and C. Bassett of your office on November 29 - December 2, 1988.

Our reply to the item of apparent non-compliance with NRC requirements is provided in the attachment.

We appreciate your inspector's comments and suggestions related to our employee safety and radiation protection programs. These comments and suggestions are helpful to us in our constant efforts to improve these programs, ensure the continued health and safety of plant personnel, and ensure our compliance with NRC regulations and license condition. We also welcome further discussion with your staff on the items in your letter and in our related reply, if necessary.

Your inspection report referred to above does not contain information which we believe to be proprietary.

Sincerely,

GE NUCLEAR ENERGY

T. Preston Winslow, Manager
Licensing & Nuclear Materials Management

/sbm

cc: Malcolm L. Ernst
Region II

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ATTACHMENT 1

The information given below refers to the item in Enclosure 1, "Notice of Violation", from NRC Inspection Report 70-1113/88-18 dated January 27, 1989.

License Condition 9 of Special Nuclear Material (SNM) License No. 1097 requires that licensed material be used in accordance with statements, representations, and conditions of Part 1 of the License Application dated October 23, 1987.

Part I, Section 2.2.1.4 of the licensee's application for license No. SNM-1097 requires that radiation protection function activities be conducted in accordance with written procedures.

Plant procedure, Nuclear Safety Release/Requirement (NSR/R), 4.8.27, Storage Pad West of FMOX Sand Blast, Rev. 2, dated July 9, 1985, requires all movable posts to be placed on concrete square markers and chains replaced when containers are not being moved across barriers.

Contrary to the above, the licensee failed to follow an approved procedure in that on December 1, 1988, barrier chains were not replaced around the storage pad west of the FMOX sand blast facility and no containers nor materials were being moved across the pad barriers.

This is a Severity Level IV violation (Supplement IV).

General Electric concurs with this violation in that internal procedures were not followed on the date specified.

At the time of the inspection, nuclear safety requirements for the storage pad area west of the FMOX sand blast facility, which is inside the defined controlled access area (CAA), were contained in Nuclear Safety Release/Requirements (NSR/R) 4.8.27, Revision 2, dated 7/9/85. Since 1986, this pad has been used only to store empty powder shipping containers (BUs), some of which may have residual internal contamination.

Nuclear safety requirements stated that the area must be permanently designated and posted "Caution - Radioactive Materials Area" and "Radiation Area" as appropriate and that perimeter chains be replaced when containers were not being moved to or from the storage pad.

In addition to the proper postings, the storage pad perimeter boundaries were defined on three sides with permanent posts and a metal chain and on the fourth side with a plastic chain. The plastic chain was suspended approximately 3' from the ground between movable marker posts to permit vehicle access. The chains were never intended for access control, but only for storage pad perimeter definition.

Prior to the NRC tour of this area on 11/30/88, the plastic chain had broken and was lying on the ground. When the apparent violation was identified to GE on 12/1/88, the appropriate NF&CM personnel were notified. On 12/2/88, the plastic chain was replaced with a metal chain which was properly suspended per the NSR/R requirements.

In order to prevent a repeat violation for this storage pad, NF&CM personnel responsible for movement of materials into or from the pad were instructed to specifically comply with the NSR/R to replace the chain when drums were not being moved to or from the pad.

In addition to the above corrective and preventive actions, a review of outside storage pad NSR/R requirements was completed to determine if all listed requirements were necessary for adequate radiological control of the area. Modifications were made to the requirements of five outside storage area NSR/Rs, including the subject BU-7 pad, to more clearly indicate the intent of the requirements.

Operations management has initiated a series of roundtable discussion meetings with affected personnel to implement the revised NSR/R storage pad requirements and to re-emphasize the need for full compliance. These meetings are scheduled to be completed March 17, 1989.

Full compliance will be achieved with the completion of the above described correction actions.

In addition to the Notice of Violation, Inspection Report 88-18 also raises several concerns relative to posting deficiencies and other radiological practices. To these, GE would like to provide the following information:

- On an outdoor temporary queue pad, a concern was expressed relative to radioactive material stickers not being placed on a waste box or on a plastic covered pallet holding empty metal cans. The posting requirement

for this area has been upgraded to include the notice that every container in the area may contain radioactive materials.

- Adjacent to the same temporary queue pad, a garden hose was observed discharging water as a safety precaution to flush the asphalt in the event of any acid spill during a tanker offloading operation. The water was running onto and along one edge of the queue pad. In response to the inspector's concerns, he was informed during the tour that materials placed on the pad were either confirmed to be free of external contamination or the contamination on materials was adequately controlled with a plastic covering. As a result, the pad area is maintained as a non-contaminated area. It was also pointed out that rather than being a poor radiological practice, water runoff such as this is no different than that which occurs during a rainstorm. All water runoff from this area drains to the on-site process lagoons which are continuously monitored to assure compliance with discharge criteria.
- A yellow and magenta ribbon was observed collected beneath a sign reading "Caution - Radioactive Material" west of the main process building (FMO/FMOX). The ribbon had been used to rope off empty UF₆ cylinders and metal cans that may contain radioactive materials when periodically queued in the area. Since there were no containers present at the time of the inspector's tour, the rope had been taken down and placed beneath the sign for future use. The posting requirements for this area have been upgraded to more clearly define the boundaries and the storage requirements of the authorized storage area and the use of temporary yellow and magenta ribbon has been eliminated.