

AUG 24 1989

official

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

General Electric Company  
ATTN: Mr. Wayne P. Lewis, Manager  
Nuclear Fuel and Components  
Manufacturing  
P. O. Box 780  
Wilmington, NC 28402

Gentlemen:

SUBJECT: MANAGEMENT MEETING SUMMARY  
(NRC INSPECTION REPORT NO. 70-1113/89-05)

This letter refers to the meeting conducted at our request at the Wilmington site on August 1, 1989. This meeting related to activities authorized by NRC License No. SNM-1097 and was attended by representatives of NRC and employees of the General Electric Company.

A summary and a list of attendees are enclosed.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure and attachment will be placed in the NRC Public Document Room.

Should you have questions concerning this letter, we will be please to discuss them.

Sincerely,

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

Enclosure:

1. Meeting Summary
2. Attachment

cc w/encls:

T. Preston Winslow, Manager  
Licensing and Nuclear  
Materials Management  
State of North Carolina

bcc w/o encls:

License Fee Management Branch

RII:DRSS

EMcAlpine:tj  
08/24/89

RII:DRSS

WClone  
08/24/89

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ENCLOSURE

MEETING SUMMARY

Licensee: General Electric Company  
License No.: SNM-1097  
Docket No.: 70-1113

SUBJECT: MANAGEMENT MEETING TO DISCUSS THE GENERAL ELECTRIC RADIATION  
PROTECTION PROGRAM

On August 1, 1989, representatives of the NRC met with General Electric personnel at the Wilmington site to discuss the findings of an inspection of the radiation protection program, in general, and the As Low As Reasonably Achievable (ALARA) program specifically. The meeting was held at the request of NRC.

The attendance list is attached.

The Regional Administrator introduced his staff and explained that there is a heightened awareness concerning safety at fuel facilities in the Commission at this time. He explained that senior management meets twice per year to discuss issues and that during the last year fuel facilities have also been discussed.

The Regional Administrator explained that the NRC had a Watch List of facilities which were receiving additional agency attention and that it was difficult to get off the list once a licensee had been placed on it. He stated that General Electric was not currently a candidate for the list. The Regional Administrator stated that based on his short tour, the facility looked better than most that he had seen. The facility had been recently shutdown and cleaned in preparation for an inventory.

Licensee and NRC representatives reviewed and discussed selected technical issues presented in Inspection Report (IR) 70-1113/89-05. The Regional Administrator (RA) noted that the inspection report indicated that the licensee appeared to have developed effective radiation protection programs; however, program implementation for specific functional areas was determined to be inadequate. The following issues detailed in the IR were reviewed and discussed.

- ° Audits - Licensee quarterly audits of radiation protection areas were adequate to identify numerous radiation protection issues requiring improvement; however, corrective actions appeared to be insufficient to prevent long-term recurrence of many of the identified concerns as noted by the NRC inspection.

- ° Routine Air Sampling Program - The RA noted the large number of stationary air samplers (SASs) utilized throughout the facility. Concerns regarding the methods, direct air flow studies and comparison of measured versus calculated in vivo (lung burden) analysis results, to assess the adequacy of the SAS locations to monitor the air breathed by workers were reviewed. NRC personnel stated that the violation detailed in the report concerned the failure to conduct, for selected facility areas, required air flow studies on an annual basis or following changes to processes or process areas. Although not regarded as a violation, the following concerns associated with the licensee's method to calculate the expected lung burden results from SAS results were discussed: (1) a non-random sample of the worker population was used; (2) the extent of uncertainties associated with the variables regarding the number of analyses conducted and the times when the analyses for different workers were conducted are unknown and not estimated; and (3) the same methods to calculate lung burdens for SAS results were utilized for both soluble and insoluble compounds. Licensee representatives stated that they believed the required air flow studies had been completed and presently were searching for the applicable data. The RA briefly discussed the use of lapel air samplers to demonstrate adequacy of air sampling systems at nuclear facilities. Licensee representatives stated that they were aware of lapel sampler uses but believed their present methods were adequate to meet both license and regulatory requirements.
- ° Air and bioassay sampling for nonroutine work. NRC representatives reviewed the licensee's failure to identify radiation protection concerns involving contract workers prior to an October 18, 1988 internal exposure incident. Although two separate incidents of these workers exceeding the action guidelines were documented and calculations to determine their potential internal exposure relative to restriction limits were conducted prior to October 18, 1988, no thorough review of the causes were conducted. Licensee representatives believed their actions regarding the October incident were thorough and complete, and the incident should be classified as a licensee identified violation (LIV). NRC representatives stated credit for LIV was not justified based on the following facts: (1) following the September 1, and the October 6, 1988 contractor bioassay results which exceeded action guidelines, no effort was made to conduct air sampling as required by 10 CFR 20.103(a)(3) for non-routine work areas where contract employees were installing heating ventilation air conditioning (HVAC) system upgrades in the controlled area; (2) the bioassay samples on October 18, 1988 identifying the problem were samples not required by the licensee but were special samples fortuitously requested by the workers; (3) the licensee failed to review other contractor personnel who may have been potentially exposed to airborne radioactive materials; and (4) the exposure values were not properly calculated for the mixture of soluble and insoluble material noted from the review of the licensee's investigation. Licensee representatives stated that evaluations of other personnel were completed. NRC representatives noted that during the onsite inspection, licensee technical personnel stated that they had not reviewed the exact contract



workers involved, and that review of the licensee's investigation report only referenced two persons involved, thus, the incompleteness of the licensee's actions precluded the issue from being categorized as an LIV pursuant to 10 CFR Part 2, Appendix C, Section V.

- ° Lack of supervisory review. NRC representative stated that increased supervisory presence in the process area was needed to note concerns and take prompt corrective actions where needed. In addition, supervisory review could be utilized to develop and implement long-term corrective actions. Licensee representatives stated that this concern regarding supervisory involvement was being addressed.
- ° Grouping of procedural concerns. Licensee representatives stated that two separate violations detailed in IR 70-1113/89-05 appeared to indicate failure to follow procedures and thus, should be considered as a single violation. NRC representatives stated that the procedural issues were grouped into common areas, one area dealing with the failure of workers to follow procedures for general radiation protection activities and a second area for radiation protection personnel failing to follow procedures regarding required surveys conducted in the controlled areas.

The Regional Administrator closed by encouraging further interaction between the licensee and Region II.

# ATTACHMENT

Licensee Attendees: B. Bentley, Manager, Fuel Production  
E. Lees, Manager, Nuclear Fuel and Component Manufacturing  
(former)  
W. Lewis, Manager, Nuclear Fuel and Component Manufacturing  
C. Vaughan, Manager, Regulatory Compliance  
P. Winslow, Manager, Licensing & Nuclear Materials  
Management

NRC Attendees: D. Collins, Chief, Emergency Preparedness and Radiological  
Protection Branch, Region II  
S. Ebner, Regional Administrator  
E. Flack, Project Manager, Office of Nuclear Materials  
Safety and Safeguards  
G. Kuzo, Senior Radiation Specialist, Region II  
E. McAlpine, Chief, Material Control & Accountability  
Section, Region II