

September 14, 1989
LD-89-103

Docket No. 70-1100
License No. SNM-1067

Dr. Ronald R. Bellamy, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety
and Safeguards
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Subject: Response to Notice of Violation
(Inspection Report No. 70-1100/89-04)

Reference: Letter, R. R. Bellamy (NRC) to P. L. McGill (C-E),
dated August 16, 1989

Dear Dr. Bellamy:

Combustion Engineering has reviewed the Notice of Violation received
with the referenced letter and our reply is provided herewith
(Enclosure).

If I can be of further assistance on this matter, please do not hesitate
to call me or Mr. J. F. Conant of my staff at (203) 285-5002.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer
Director
Nuclear Licensing

AES:jeb

Enclosure: As stated

cc: D. McCaughey (NRC)
J. Roth (NRC - Region I)

Power Systems
Combustion Engineering, Inc.

1000 Prospect Hill Road
Post Office Box 500
Windsor, Connecticut 06095-0500

(203) 688-1911
Telex: 99297

8910030500 890914
PDR ADDCK 07001100
C PDC

JE07

Response to Notice of Violation
(NRC Inspection Report No. 70-1100/89-04)

Statement of Violation

Condition 21 of License No. SNM-1067 requires: "The licensee shall maintain and execute the response measures of his Radiological Contingency Plan submitted to the Commission on June 7, 1982. The licensee shall maintain implementing procedures for his Radiological Contingency Plan as necessary to implement the Plan."

Section 7.3 of this Plan, entitled "Test and Drills", states, in part: "Semi-annual site emergency evacuation drills are conducted to test promptness of response, adequacy of procedures, emergency equipment, and the overall effectiveness of the emergency plan. At least one of the two drills given annually will be part of an overall exercise that involves participation by off-site agencies to test as a minimum the communication links and notification procedures."

Contrary to the above, in 1988, the licensee failed to conduct a drill that was part of an overall exercise involving participation by off-site agencies.

Response

Combustion Engineering, Inc. recognizes that the Radiological Contingency Plan requires that one of the two annual facility evacuation drills include participation of off-site agencies to test, as a minimum, the communication link and notification procedures. We believed, however, that the test of this requirement was successfully demonstrated during each of the six times that we actually requested assistance from off-site support agencies (i.e., Fire, Police, Ambulance) for our fuel manufacturing facility in 1988.

Nevertheless, it is planned that the next facility emergency evacuation drill to be conducted during 1989 will include the participation of off-site support agencies to test the communication system and notification procedures. Compliance with the subject license requirement will, therefore, be satisfied for 1989 upon completion of this drill. In future years, tests of the communication link and notification system will be conducted in strict accordance with the Emergency Response Plan in effect at the time.