

409 North 8th Street
Apollo, Pa. 15613

March 11, 1987

John P. Murtha
United States Congress
Washington, D.C. 20515

Dear Congressman Murtha:

I have enclosed information on the Babcock & Wilcox facility in Parks Township that I believe is important. It is very simple to understand and I am sure you will see why I have to question this issue.

Enclosure 1 contains a page of B&W's Materials License No. SNM-414, dated December 31, 1986, signed by Leland Rouse (NRC). If you will notice in Condition No. 25 it states that B&W shall perform the environmental program described in Chapter XIII of the "Environmental Data for the Leechburg Site Materials Plant of the Nuclear Materials Division of the Babcock & Wilcox Company, dated September 5, 1975. Also, that subsequent revisions must be approved by the Safety Advisory Board (SAB) and submitted to the NRC for information within 30 days of the SAB approval, and that B&W shall make no changes to the environmental program that would decrease the effectiveness of the program without prior Commission approval.

Enclosure 2 contains a page from a 1980 inspection report which discusses this Environmental Program for the Parks Twp. site but under another license number condition. If you will notice, the environmental program was revised. It seems that changes have been made to the described program in Chapter XIII, dated September 5, 1975. It states there is a revised Chapter XIII dated March, 1980, and was approved by the SAB on May 5, 1980, and according to B&W, had been in use. It also states that it had not been submitted to the NRC/NMSS for approval. This was identified as an unresolved item and referred to NRC/NMSS for resolution.

I'm concerned about the accuracy of License Condition 25. What environmental program are they required to perform and what environmental program are they performing?

I hope you will understand how important this is and give this your prompt attention.

Sincerely,



Cindee Virostek

MATERIALS LICENSE
SUPPLEMENTARY SHEETLicense number
SNM-414Docket or Reference number
70-364

DEC 31 1986

19. The release of equipment or packages from the controlled areas for unrestricted use shall be in accordance with the attached Annex C, dated November 1976. For internal plant transfers from controlled contamination areas to contamination free areas, the surface contamination levels given in Table I of Annex C shall apply; and the package shall be clearly identified to prevent release from the contamination free area to uncontrolled areas for unrestricted use.
20. Notwithstanding the text of page I.B.5.6., item ii relative to periodic smoke tests to assure room air flow from noncontaminated areas to contaminated areas, the differential pressure instrumentation data shall be logged, compared with smoke test results, and also used as a basis for corrective action.
21. Notwithstanding the text of Specification, I-9 and I-10 of Chapter I of the application, the licensee shall follow all provisions of the Materials and Plant Protection Amendment MPP-1 or subsequent revisions applicable to License SNM-414.
22. At the end of plant life, the licensee shall decontaminate the facility and grounds in accordance with the general decommissioning plan for License SNM-414 submitted in the enclosure to the letter dated February 17, 1978, and supplement transmitted by letter May 17, 1978, so that these facilities and grounds can be released for unrestricted use. The financial surety arrangement, to provide assurance on a continuing basis that funds will be available for decommissioning, described by letter dated March 13, 1978, is hereby incorporated as a condition of the license.
23. Current copies of Operating Procedures and RCWP's shall be readily and conveniently available to the operators.
24. The licensee shall inform the NRC Region 1 office of any violation of the NPDES permit at the same time that EPA is informed. Changes to the NPDES permit will be promptly reported to the NRC Region I office.
25. The licensee shall perform the environmental monitoring program described in Chapter XIII of the submission "Environmental Data for the Leechburg Site Materials Plant of the Nuclear Materials Division of The Babcock & Wilcox Company," September 5, 1975. Subsequent revisions must be approved by the Safety Advisory Board (SAB) and submitted to the NRC for information within 30 days of SAB approval. The licensee shall make no changes to the environmental program that would decrease the effectiveness of the program without prior Commission approval.

The inspector noted that the SAB had approved a draft of the revised Chapter XIII of the "Environmental Data for the Parks Township Site Materials Plants." Chapter XIII defines the site environmental monitoring program with respect to Radiological Environmental Monitoring. License Condition 28 states that the licensee shall perform the environmental monitoring program described in Chapter XIII of the submission "Environmental Data for the Leechburg Site Materials Plants of the Nuclear Materials Divisions of the Babcock and Wilcox Company," dated September 5, 1975 or subsequent approved revisions. The revised Chapter XIII dated March, 1980 was approved by the SAB on May 5, 1980 and according to the licensee representatives has been in use since SAB approval for the conduct of the facility environmental monitoring program. However, according to licensee representatives, the revised Chapter XIII dated March, 1980 has not been submitted to NRC-NMSS for approval. Since License Condition 28 does not specifically identify that NRC-NMSS must approve subsequent revisions, this was identified to the licensee as an unresolved item (80-24-01) which was referred to NRC-NMSS for resolution.

c. Plutonium Plant Decontamination and Decommissioning Committee

The licensee has established a management level committee which has been charged with overseeing actions taken during the decontamination and decommissioning of the plutonium plant. Committee members include:

R. M. Jackman, Chairman, Manager Quality Assurance
 M. A. Austin, Manager, Technical Control
 E. L. Bellisario, Manager, Safeguards
 W. J. Ross, Manager, Plutonium Decommissioning
 D. R. Smay, Manager, Materials

The inspector examined the minutes of two meetings of the Plutonium Plant Decontamination and Decommissioning Committee held between April 7, 1980 and August 7, 1980. Topics discussed included: a review of license requirements regarding decontamination and decommissioning of the plant, review of criteria established for the disposition of plant equipment; preparation of internal decommissioning plans; plant personnel requirements; establishment of a schedule of activities relating to plant decommissioning; methods of equipment decontamination; preparation of material for shipment; and material safeguards considerations.

No items of noncompliance were identified.

7. Nonroutine Events

a. Fire in a Decommissioned Hood

At approximately 12:00 noon on October 9, 1980, a heat detector in a hood located in the Fab 5 chemistry laboratory set off the facility

fire evaluation alarm. No personnel were in the facility restricted area at the time. An emergency team wearing full face supplied air respirators entered the area, observed that a plywood cover on the hood was smoldering, removed the plywood cover and extinguished the fire in the hood by about 12:20 p.m. This hood had been decontaminated to low specific activity (LSA) levels and prepared for shipment for burial at the Beatty, Nevada burial site. During preparation for burial the licensee had placed fire retardant ceiling tiles (also LSA) into the hood and then had covered the hood front with a plywood sheet. The plywood sheet was held in place by means of metal bands which had been welded to the sides of the hood about 2 hours earlier. The licensee established a continuous fire watch in the area for the following 24 hour period. The licensee speculated that the ceiling tiles ignited during the tack-welding operation.

The inspector examined licensee records which indicated that no personnel were injured or contaminated, that no significant airborne contamination was released to the restricted area and no airborne contamination was released to the environment. There was no damage to the plant other than minimal damage to the decommissioned hood which was subsequently properly sent to the burial site in Beatty, Nevada as LSA waste. General air samplers in the laboratory indicated contamination levels to a maximum of 6.4 dpm alpha/m³, the floor of the laboratory was contaminated to a maximum level of 46 dpm alpha/100 cm² removable and the maximum plant stack air sample showed a total of 0.05 dpm alpha/m³ released to the environment from 0700 to 1530 hours on October 9, 1980. Corresponding limits established by the licensee as described in the facility Health and Safety Manual (Appendix 1) are: <4.4 dpm alpha/m³ (Paragraph 2.1.2.4), <100 dpm alpha/100 cm² (Paragraph 2.1.2.3) and, <0.13 dpm alpha/m³ (Paragraph 2.1.1.4), respectively.

Corrective actions taken by the licensee included the establishment of restrictions on this type of welding on full hoods or boxes and the establishment of a procedure which requires that welding, if necessary, will be done prior to filling the hoods or boxes with potentially flammable materials.

No items of noncompliance were identified.

b. Release of Radioactive Material to Unrestricted Areas

A routine exhaust stack sample collected and analyzed on August 19, 1980 indicated that a release of radioactive material to the environment had occurred from the stack associated with Hot Cell Fan No. 4.

Sample analysis indicated that the release averaged less than 5.36 times the maximum permissible concentration for soluble plutonium-239 when averaged over a 24 hour period.

NISS / Fuel Cycle Material	
FCIF	_____
FCMF	_____
File:	_____
Docket #	90-135 / 364
Project #	_____
Other	_____
POR	yes
UES	yes
Return to	FR/AMW
	SS 305