

License Nos.: 37-00030-02
37-00030-08

Docket Nos.: 03005980
03005982

Safety Light Corporation

Title: Letter dated September 22, 1983 transmitting report of inspection at Safety Light Corporation on March 8, 1983 (also at ML033140438 and ML033160100)

This document is Exhibit No. 27 to NRC Staff's Motion for Summary Disposition As To NRC Jurisdiction Over USR Industries, Inc., USR Lighting, Inc., USR Chemical Products, Inc., USR Metals, Inc., and USR Natural Resources, Inc., dated June 30, 1992 (ML040230156) and NRC Staff's Statement of Undisputed Material Facts As to Which No Genuine Issue Remains (ML040230151)

List of all Exhibits at ML040220785.

Tab. 27
Staff Exh. 27

Docket Nos. 30-5980 ✓
30-5981
30-5982
30-5335
30-8444

SEP 22 1983

License Nos. 37-00030-02 ✓
37-00030-07E
37-00030-08
37-00030-09G
37-00030-10G

Safety Light Corporation
ATTN: Mr. Jack Miller
President
4150-A Old Berwick Road
Bloomsburg, Pennsylvania 17815

Gentlemen:

Subject: Combined Inspection Nos. 30-5980/83-01, 30-5981/83-01, 30-5982/83-01,
30-5335/83-01 and 30-8444/83-01

This refers to the routine safety inspection conducted by Mr. F. Costello and Ms. N. Dennis of this office on March 8, 1983, of activities authorized by NRC License Nos. 37-00030-02, 37-00030-07E, 37-00030-08, 37-00030-09G, and 37-00030-10G and to the discussions of our findings held by Mr. Costello and Ms. Dennis with yourself and other members of your staff at the conclusion of the inspection, and to a subsequent telephone discussion between Mr. Costello and Dr. MacHutchin on March 24, 1983.

Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. This violation has been categorized by severity level in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register Notice (47 FR 9987) dated March 9, 1982. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

From the discussion at the conclusion of the inspection, we understand that you will take the necessary actions to stabilize the contaminated soil recently removed from the backyard of an adjacent property which is now located in a large mound at the rear of your facility.

We also understand that you will submit to the USNRC, Materials Licensing Branch, Division of Fuel Cycle and Materials Safety, Washington, D. C. 20555, the details of the recent change in the ownership of the Safety Light Corporation, including the date of the transaction, a discussion of the reorganization which occurred when the name of the licensee changed from U. S. Radium to Safety Light Corporation on November 24, 1980, a description of the current organization of the Safety Light Corporation and a description of who is financially responsible for the ultimate decontamination of the radioactive

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materials buried on your property. In your reply to this letter, please specifically confirm our understandings and provide a schedule for completing these actions.

You are advised that you should also promptly submit a report of the status and schedule for decontamination activities for the 12-month period commencing on July 1, 1983, to the NRC's Materials Licensing Branch in Washington, D. C.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10-day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us in this matter is appreciated.

Sincerely,

Original Signed By:

John D. Kinneman *for*

Thomas T. Martin, Director
Division of Engineering and
Technical Programs

Enclosures:

1. Appendix A, Notice of Violation
2. NRC Region I Inspection Report Number 83-01

cc w/encls:

Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania ✓

bcc w/encls:

Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encls) ✓

for
RI:DETP
Dennis/lp
8/20/83

for
RI:DETP
Costello
8/22/83

for
RI:DETP
Kinneman
8/22/83

IE-01

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APPENDIX A

NOTICE OF VIOLATION

Safety Light Corporation
Bloomsburg, Pennsylvania

Docket No. 30-5982
License No. 37-00030-08

As a result of the inspection conducted on March 8, 1983, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

Condition 17 of License No. 37-00030-08 requires that licensed materials be possessed and used in accordance with statements, representations, and procedures contained in application dated December 15, 1980, which includes by reference Appendix 21, which is Revision 2 of Safety Light Corporation's Health and Safety Program which was issued December 1, 1980.

Section 5.2.1 of the Health and Safety Program requires that daily smear surveys be performed in any magenta designated room of the production facility on each day production activity has taken place and that smear surveys also be performed daily in high traffic areas, i.e., restrooms, lunchrooms, and hallways, each day of production.

Contrary to the above, daily smears were not performed on days when production activities were being conducted in these areas: in the active screening room on December 8, 9, 13, and 17, 1982, and on January 14, February 15, 17, and 22, 1983; in the tritium gas processing area on January 4, 11, 13, 19, 24, 27, and 28, February 11, 15, 22, and 24, and March 1 and 2, 1983; and in the restrooms on January 4, 6, 7, 11, 13, 14, 18, 20, and 28, February 2, 3, 4, 8, 9, 10, 11, 15, 16, 18, 22, 23, 24, and 25, and March 1, 2, 3, 4, and 8, 1983.

Pursuant to the provisions of 10 CFR 2.201, Safety Light Corporation is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

U. S. NUCLEAR REGULATORY COMMISSION

Region I

Report Nos. 30-5980/83-01
30-5981/83-01
30-5982/83-01
30-5335/83-01
30-8444/83-01

Docket Nos. 30-5980
30-5981
30-5982
30-5335
30-8444

License Nos. 37-00030-02 Priority 1 Category B
37-00030-07E
37-00030-08
37-00030-09G
37-00030-10G

Licensee: Safety Light Corporation
4150-A Old Berwick Road
Bloomsburg, Pennsylvania 17815

Facility Name: Safety Light Corporation

Inspection At: Bloomsburg, Pennsylvania

Inspection Conducted: March 8, 1983

Inspectors:

Francis M. Costello, Radiation Dosimetry
Specialist

9/20/83
date signed

Nancy A. Dennis, Senior Radiation Specialist

9/20/83
date signed

Approved by:

John D. Kinneman, Chief, Nuclear Materials
Section A

9/20/83
date signed

Inspection Summary:

Inspection conducted on March 8, 1983 (Report Nos. 30-5980/83-01; 30-5981/83-01; 30-5982/83-01; 30-5335/83-01, and 30-8444/83-01)

Areas Inspected: Routine unannounced inspection, including review of scope of current operations, decontamination operations, organization, contamination control, training, bioassay, stack releases, restricted area air concentrations, package surveys, solid waste disposal, radiation safety committee meetings, material inventory, and quality assurance.

Results:

One violation was identified: (Violation: Failure of the licensee to conduct daily smears in magenta areas during periods of production activity constitutes a violation of Condition 14 of License No. 37-00030-08.

Details

1. Persons Contacted

- *Jack Miller, President, Safety Light Corporation
- *John Watts, Vice-President
- *John MacHutchin, Radiation Safety Officer
- *Charles Berlin, Radiation Safety Technician
 - Jack Sorber, Technician
 - Doug Rogers, Technician
 - Gail Bartholomew, Technician
 - Larry Harmon, Technician

*Denotes those present at exit interview.

2. Scope of Current Operations

The only isotope used and distributed by the licensee is tritium. The licensee continues to manufacture luminescent, commercial aircraft and exit signs, prepare tritiated titanium and scandium gas chromatograph foils and accelerator targets, and paint watch dials and signs with luminous tritiated paint. The majority of dial painting is by silk screen type operation, although some hand painting is being performed.

No violations were identified.

3. Review of Decontamination Operations

The inspectors toured the grounds of the facility with licensee representatives. The licensee stated that they are continuing to monitor water from 23 bore holes onsite and at the perimeter of the licensee's property to evaluate the status of radioactive material that was buried on the property during the 1950's and 1960's. Water from approximately 10 of the 23 bore holes is sampled monthly. Analysis is performed for the licensee by a contractor. Licensee representatives stated that no future decontamination operations or activities are planned concerning clean-up of this buried material, unless environmental samples indicate movement or elevated concentrations of radioactive material.

Licensee representatives informed the inspectors of contaminated material which they voluntarily removed from an adjoining private residence around July 28, 1982. The licensee noticed that a private resident, whose property adjoins Safety Light Corporation, was grading his backyard. Safety Light representatives surveyed the backyard and determined that Safety Light Corporation should perform the grading operations for the adjoining resident as the survey indicated some contamination of the soil. The licensee subsequently found and removed soil from one area in the yard with activity that was 6 feet deep. The licensee removed the contaminated soil from the adjoining residence and placed this material on Safety Light property in a large mound at the rear of the property.

Licensee representatives stated that plans to stabilize the contaminated soil mound to prevent further spread of the material would be made in the near future. The inspector split a sample of bore hole #1 water with the licensee and analyzed it in the Regional Office laboratory. The result of NRC's analysis was consistent with the licensee's analysis and did not indicate any significant differences from the value reported by the licensee.

No violations were identified.

4. Organization

The licensee notified NRC licensing staff by letter dated January 21, 1981, that the name of the Corporation should be changed from U.S. Radium to Safety Light Corporation.

The inspectors learned from discussions with the licensee's management that actual ownership of the Bloomsburg facility had changed on November 24, 1980, when U.S. Radium sold the facility and a portion of the activities previously conducted at the Bloomsburg facility to the current President and Vice President of the Safety Light Corporation. The remainder of the previous activities conducted by U.S. Radium at the Bloomsburg facility were transferred to U.S.R. Metals Corporation. Licensee representatives agreed to provide full details of the transfer of ownership to NRC's licensing staff.

No other significant personnel changes were identified during the inspection.

This matter remains open and will be reviewed by the inspectors with the licensee during the next inspection.

5. Contamination Control

The inspectors toured the foil manufacturing, tube filling and manufacturing, and watch dial screening and painting facilities. The inspectors reviewed the records of the licensee's daily contamination surveys for all magenta areas where production activity has taken place and in major thoroughfares since the previous inspection.

The inspectors identified that the licensee had failed to perform daily smear surveys when daily production activities were conducted on the following days:

a. Active Screening Room

February 15, 17, and 22, 1983

January 14, 1983

December 8, 9, 13, and 17, 1982

b. Tritium Gas Processing

March 1 and 2, 1983

February 11, 15, 22, and 24, 1983

January 4, 11, 13, 19, 24, 27, and 28, 1983

c. Restrooms

March 1, 2, 3, 4, and 8, 1983

February 2, 3, 4, 8, 9, 10, 11, 15, 16, 18, 22, 23, 24, and 25, 1983

January 4, 6, 7, 11, 13, 14, 18, 20, and 28, 1983

The inspectors took 21 swipes from the active processing areas. The licensee assayed each of these samples before inspectors left the site on the day of the inspection. NRC independent analysis of these swipes at NRC Region I counting facilities indicate that the licensee's results were equivalent or higher than the NRC analysis of these swipes.

Failure of the licensee to conduct daily surveys in magenta areas during periods of production activity constitutes a violation of Condition 14 of License No. 37-00030-08.

6. Training

The inspectors interviewed several technicians who work in the gas fill and foil impregnating room. They stated that each had received initial instruction in the principles of radiation protection by the Health Physics staff and subsequently had received annual retraining. The individuals interviewed appeared to be knowledgeable in the license procedures and NRC requirements.

No violations were identified.

7. Bioassay

Licensee representatives stated that weekly urinalyses are performed on all individuals working with tritium. The inspectors reviewed the licensee's records from 1981, up to the date of this inspection and determined that no urine specimens had concentrations greater than 14 microcuries per liter. The inspectors split an employee urine sample with the licensee and analyzed them in the Regional Office Laboratory. NRC analysis results were in agreement with the licensee's analysis considering differences in counting geometry and equipment.

No violations were identified.

8. Stack Releases

All building exhausts are combined for discharge through a single stack, 0.6m in diameter and 18m high. Continuous monitoring of this stack for

particulate, aqueous and gaseous forms of tritium is performed using filters and ethylene glycol bubblers in conjunction with an oxidizer furnace. Filters and ethylene glycol solutions are changed and analyzed daily. The licensee has determined diffusion factors for the exhaust stream under predominant meteorological conditions (wind toward the southeast) and utilizes these factors to calculate the concentration released to unrestricted areas.

Operations involving possible airborne releases are performed under exhaust ventilation. Silica gel (indicating-type) columns and molecular sieve back-up columns are used for treatment of gas streams with potentially high concentrations of tritium. These are replaced when needed as determined by observation of the silica gel. The old columns are disposed of as solid waste.

Licensee records indicate that during 1981, 0.2 curies of tritium were released as particulates, 190 curies as tritiated water vapor, and 2230 curies as gaseous tritium; during 1982, 0.2 curies of tritium were released as particulates, 150 curies as tritiated water vapor, and 1435 curies as gaseous tritium.

The concentrations of tritium in particulate and gaseous forms were less than 63 percent of maximum permissible concentrations (MPC) found in Appendix B, Table II of 10 CFR Part 20 in 1981 and less than 41 percent in 1982.

The concentration of tritium in the form of tritiated water averaged 10.7 times MPC in 1981 and 8.4 times MPC in 1982. The inspectors noted that since 1980 the concentration of tritiated water has decreased by a factor of two. Licensee calculations of the dilution factors for stack releases indicate ground level concentrations at the site boundary are well below the MPC's for release.

Licensee measurements of stack effluents at the point of release for unrestricted areas and environmental offsite air sampling were verified in a report by Oak Ridge Associated Universities, dated November 1982. The contractors concluded that the environmental tritium monitoring and control program established by Safety Light Corporation was adequate.

One significant stack release totalling 145 curies of tritium over the 24-hour period from January 13 - 14, 1983, as a result of two accidental releases from the gas fill system, was reviewed by the inspectors. Licensee calculations indicate that the average ground level concentration of tritium at approximately 125 meters downwind from the stack was $3 \times 10^{-7} \mu\text{Ci/ml}$ of air, or about $0.01 \times \text{MPC}$ (MPC for unrestricted area for $^3\text{H}_{\text{sub}}$ being $4 \times 10^{-6} \mu\text{Ci/ml}$). The licensee documented from independent

measurements over 12 months from the Environmental Sampling System that it was appropriate to perform calculations assuming submersion conditions versus soluble tritium limits since the conversion of tritium to tritiated water is not complete at this point. Based on data review of licensee evaluation of the incidence, the inspectors agreed with the licensee's calculation of the release and compliance with regulatory limits.

The licensee samples airborne tritium at three locations along the property boundary. The three samples are located along the east property line based on the prevailing westerly winds. The first sample is located on the center line of the prevailing downwind direction from the stack. The other two samples are taken 150 feet north of this center line. These samples are measured for soluble tritium only. As noted above, stack releases are measured to average below Part 20 limits for gaseous and particulate tritium.

Licensee records show that airborne concentration at these points averaged approximately 10^{-9} microcuries per milliliter, less than one percent of the applicable MPC.

No violations were identified.

9. Restricted Area Air Concentrations

The inspectors noted that air monitors were in operation which would alarm when the restricted area MPC is exceeded. Employees told the inspectors that they would immediately leave the area should an alarm sound.

On the day of inspection, the scrubber system alarm setting was 1000 $\mu\text{Ci}/\text{m}^3$, the fill hood system alarm setting was 100 $\mu\text{Ci}/\text{m}^3$, and the general air alarm in the room was set at 10 $\mu\text{Ci}/\text{m}^3$. The inspectors did observe the employees leaving the room on the day of the inspection when a small release occurred in the work area.

No violations were identified.

10. Package Surveys

The inspectors reviewed the records of surveys of incoming and outgoing packages. The highest level of removable contamination found on a package which had been received since the last inspection was 20,000 dpm/100cm² on February 17, 1983. All packages are surveyed prior to leaving the gas filled room and results are recorded prior to shipment.

No violations were identified.

11. Solid Waste Disposal

The licensee made one shipment of radioactive waste to an authorized burial site in December of 1982. The shipment consisted of 85 drums

containing a total of 8,352 curies of tritium. The records of this shipment indicated compliance with the DOT regulations.

The inspectors split a sample of water from the Waste Tank with the licensee and analyzed it in the Regional Office laboratory. The results were consistent with the licensee's analysis.

No violations were identified.

12. Radiation Safety Committee Meetings

The minutes from Radiation Safety Committee meetings were reviewed by the inspectors. The inspectors noted that on those occasions where the contamination levels exceeded 50,000 dpm/100cm² that immediate decontamination efforts were initiated and continued until repeat wipe surveys indicated removable contamination levels of less than 50,000 dpm/100cm².

Records indicated that the Radiation Safety Committee was informed of any instances of high levels of contamination and subsequent decontamination activities by the Radiation Safety Office.

No violations were identified.

13. Material Inventory

The licensee's inventory indicated that they possessed 64,500 curies of tritium as tritiated gas, foils, paint and liquid on the day of inspection.

No violations were identified.

14. Quality Assurance

The inspectors reviewed the procedures used to test gas-filled products to assure adequacy of the tritium seals. The procedure includes visual inspection and wipe tests of all individual tubes of gas. The completed units are placed in a chamber whose air is monitored for tritium to detect any leakage.

No violations were identified.

15. Exit Interview

The inspectors met with the licensee representatives denoted in paragraph 1 at the conclusion of the inspection. The inspectors summarized the scope and findings of the inspection.