

AUG 24 1965

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DML:RLL
70-371

United Nuclear Corporation
Fuels Division
P. O. Box 1883
365 Winchester Avenue
New Haven, Connecticut 06508

Attention: Mr. D. F. Cronin
Director of Licensing
Your reference: RBK:NLS:196

Gentlemen:

This refers to your application dated June 21, 1965, transmitting your plans for administrative control of activities performed in connection with the fabrication of reactor fuel components under Special Nuclear Material License No. SNM-368. There are some aspects of the procedures which we feel should be augmented and/or clarified; these aspects are identified below:

1. The organizational chart for the Nuclear Licensing and Safety Department appears to indicate that the Health Physics and Safety Supervisor is the only person physically located at the chemicals plant in Hematite, Missouri having primary responsibility for day to day safety of the operations covered by License No. SNM-33. This appears to be a significant departure from the arrangement described in the organization chart, Figure 207.1.1, contained in the consolidated application dated January 22, 1965, for renewal of License No. SNM-33. That chart showed that nuclear safety responsibilities for the Hematite facility were assigned to a position designated as Nuclear Safety Engineer, temporarily filled by the Operations Control Manager. Accordingly, we are interested in the nuclear safety capability present at the Hematite facility and would like to receive a description of the Health Physics and Safety Supervisor's responsibilities as they pertain to nuclear safety at the Hematite facility and his qualifications, training and experience in regard to nuclear safety.

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2. In your description of the Nuclear Licensing and Safety Department responsibilities for determining nuclear safety parameters, reviewing and approving design or changes in equipment or procedures, it appears that one individual has the authority to recommend such parameters and also to review and approve the equipment or procedures without having such determinations and approvals independently verified by another qualified individual. We believe such independent verification should be made to minimize the possibility of errors.
3. On page 5, under the paragraph entitled "Equipment and Facility Design Personnel," it is stated that in the design of new equipment or processes, or changes thereto, the personnel in this group have the responsibility for assuring themselves that the proposed usage meets approved nuclear safety criteria and that in some instances formal approval of specific items may be required by the Nuclear Licensing and Safety Department. This procedure does not appear to be consistent with the responsibilities specified on page 2 for the Nuclear Licensing and Safety Department. Please clarify. If the Design Personnel do not consult the safety department in all instances where such design or change in equipment and/or procedures involve special nuclear material, please provide the qualifications of such personnel and the guide lines to be followed in determining those items which do not require the safety department review and approval.
4. In Appendix A1, the qualifications of named key personnel are described. You should also provide the minimum qualifications to be required for each position held by these key personnel so that changes in personnel do not involve licensing action.
5. Since the safety of the manufacturing processes depends primarily on employees following prescribed procedures, please describe your arrangements and objectives for training employees in nuclear safety and plant procedures (operating and emergency) prior to their working with

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special nuclear materials. Also, please provide a general description of the arrangements for periodic training and assessment of employee capability and performance.

Very truly yours,

Donald A. Nussbaumer, Chief
Source and Special Nuclear Materials Branch
Division of Materials Licensing

DISTRIBUTION:

Doc. Rm.

Br. & Div.rfs

Compliance (2) HQRs

Suppl.

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XXXXXX

C. Luke, ML

SEE ATTACHMENT FOR CONCURRENCES

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|-----------|--------------|-------|-------------|--|--|--|
| OFFICE ▶ | ML | ML | ML | | | |
| SURNAME ▶ | RLayfield/jc | CLuke | DNussbaumer | | | |
| DATE ▶ | 8/23/65 | | 8/20/65 | | | |

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United Nuclear Corporation
Fuels Division
P. O. Box 1883
365 Winchester Avenue
New Haven, Connecticut 06508

Attention: Mr. D. F. Cronin
Director of Licensing
Your reference: REK:NLS:196

Gentlemen:

This refers to your application dated July 21, 1965, transmitting your plans for administrative control of activities performed in connection with the fabrication of reactor fuel components under Special Nuclear Material License No. SNM-368. There are some aspects of the procedures which we feel should be augmented and/or clarified; these aspects are identified below:

1. It was noted on the organizational chart for the Nuclear Licensing and Safety Department which represents Corporate control over nuclear fuel processing facilities, that the Health Physics and Safety Supervisor is listed as the only person physically located at the chemicals plant in Hematite, Missouri having primary responsibility for day to day control of safety for operations covered by License No. SNM-33. It appears that this is a rather significant departure from the arrangement described in the organizational chart, Figure 207.1.1, contained in the consolidated application dated January 22, 1965, for renewal of License No. SNM-33. This chart showed that safety responsibilities for the Hematite facility were assigned to a position designated as Nuclear Safety Engineer, temporarily filled by the Operations Control Manager. Accordingly, we request a description of the Health Physics and Safety Supervisor's responsibilities as they pertain to nuclear safety at the Hematite facility and information regarding his qualifications, training and experience in regard to nuclear safety.

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2. In your description of the Nuclear Licensing and Safety Department responsibilities for determining nuclear safety parameters, reviewing and approving design or changes in equipment or procedures, it appears that one individual has the authority to recommend such parameters and also to review and approve the equipment or procedures without having such determinations and approvals independently reviewed by another qualified individual. We believe such independent review should be made to minimize the possibility of errors.
3. On page 5, under the paragraph entitled "Equipment and Facility Design Personnel," it is specified that in the design of new equipment or processes, or changes thereto, that personnel in this group have the responsibility for assuring themselves that the proposed usage meets approved nuclear safety criteria and, that, in some instances, formal approval of specific items may be required by the Nuclear Licensing and Safety Department. This procedure does not appear to be consistent with the responsibilities specified on page 2 for the Nuclear Licensing and Safety Department. Please clarify this apparent inconsistency. If the Design Personnel do not consult the safety department in all instances where such design or change in equipment and/or procedures involve special nuclear material, please provide the qualifications of such personnel and guide lines to be followed in determining those items which do not require the safety department review and approval.
4. In Appendix A1, the qualifications of named key personnel are described. In anticipation of changes in such personnel, we believe that you should provide the minimum qualifications to be required for each position held by these key personnel.
5. Since the safety for manufacturing processes depends primarily on employees following prescribed procedures, please describe your arrangements and objectives for training employees in nuclear safety and plant procedures (operating and emergency) prior to their working with special nuclear materials. Also, please provide a general description of the arrangements for periodic training and assessment of employee capability and performance.

DISTRIBUTION:

Doc. Rm. Compliance (Vary) Yours,
Br. & Div. rfs Suppl. C. Luke, ML

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|-----------|---------------|---------|---|-------------|--|
| OFFICE ▶ | ML | ML | SEE ATTACHED SHEET FOR CONCURRENCES | ML | |
| SURNAME ▶ | R Layfield/jc | CLuke | Donald A. Nussbaumer, Chief Source and Special Nuclear Materials Branch | DNussbaumer | |
| DATE ▶ | | 8-12-65 | Division of Materials Licensing | | |