

"OFFICIAL RECORD COPY"

MAR 21 1985

TII Industries, Inc.
Attn: Mr. Raul Pelegrina
Plant Manager
P. O. Box 433
Toa Alta, Puerto Rico 00758

Gentlemen:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING A MATERIAL LICENSE
APPLICATION, (REFERENCE: 17707; 030-10273)

This refers to your application received June 21, 1984, for renewal of License Number 52-15968-01. Also, this refers to your letter dated November 27, 1985 in which you provided answers to certain questions raised during a visit to your facility on October 24, 1984 by Messrs. Robert Brown and Phillip Chambless of this office. Additional information is needed in support of your application.

Please provide the following information:

1. Item 2 in your letter dated November 27, 1984, specifies that you process up to 200 tubes per hour for each work station or a possible total of 2,496,000 tubes per year for all six work stations. The release total you show is 3192 curies of tritium per year for all six stations. Our calculations show that based on the information you have provided, the total number of curies of tritium released from your facility is 3420 curies per year. This is the maximum amount that could be released from your facility except for unplanned or accidental releases. If our calculations are incorrect please provide us with your calculations.
2. Item 3 in your letter states that water samples have been collected by Mr. Santiago Gomez and no "activity" was found. We believe it is appropriate for you to routinely analyze environmental samples collected in the vicinity of your plant. For at least six months, it is appropriate that you collect and analyze on a monthly basis the following samples in the vicinity of your plant:
 - a. Milk samples from the nearby dairy;
 - b. Food and water samples from the nearby school and residences;
 - c. Water samples at various locations around your plant;
 - d. Soil and vegetation samples at various locations around your plant.

In conjunction with the sampling program please describe how you will analyze the samples, including a description of the instrumentation used and your calibration procedures.

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Please note that if the above sampling program reveals that little or no activity is detected in the environs around your plant, we shall be happy to amend your license to permit you to perform sampling at less frequent intervals.

3. Item 4 in your letter states that residences are within 100 feet of your process stacks. Please provide two (2) updated copies of your map (Dwg. No. BP 1000-01) showing the approximate locations of your two process stacks and their relative locations from nearby residences, schools and the dairy.
4. Item 5 in your letter provides information concerning your program for maintaining employee uptakes of tritium ALARA. Our ALARA program also pertains to effluent releases. An acceptable ALARA program for effluent releases, for example, would encompass the following:
 - a. Establish as a guideline that the maximum concentration of tritium in air released from your facility would be ten percent of the limits established in 10 CFR Part 20, and
 - b. Establish procedures for investigating any releases from your facility which exceed the ten percent guidelines and for taking corrective actions to prevent the recurrence of similar releases.

If you are unable to establish an ALARA program similar to the above please provide information describing your own program. It is appropriate for you to consider costs, technology of your air handling equipment, the quantities being released from you facility, etc. The information you have provided indicates that you are releasing tritium air concentrations which are up to 60 percent of the maximum permissible air concentrations established in 10CFR Part 20. This is not acceptable to the Nuclear Regulatory Commission and may not meet the ALARA concept as stated in Section 20.1(c), 10CFR Part 20. You should refer to this Section in Part 20 in preparing your reply to us.

5. Item 14 in your letter states that authorized users are sent to the USA for training. We have reviewed the training and experience of your present individual users and have no further questions. We do, however, have questions concerning the instruction and training of employees other than your individual users who frequent your restricted area. (Janitors, maintenance personnel, etc.) Please refer to Section 19.12 of the enclosed 10 CFR Part 19 and provide information describing the instructions given to these employees.

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Our review of your application will continue upon receipt of the above information. Please provide two copies of your reply and reference Mail Control Number 17707.

Sincerely,

Paul R. Guinn
Senior License Reviewer
Nuclear Materials Safety Section

1. 10CFR Part 19
2. 10CFR Part 20

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PGuinn
3/21/85

RII
JPotter
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R II
P. Guinn
3/21/85

1/10/85

Paul,

My Comment on 11/27/94 TII Letter.

(1) They cannot demonstrate 10% of Part 20 limits with respect to the levels at the stack release point. (ALARA requirements)

(i.e. they show a annual average release of 60% of $4 \times 10^{-5} \mu\text{Ci/cc}$ (submission value))

(They might be able to show this ^(10%) at the true unrestricted boundary near the residences located nearby)

(2) Need some explanation of S. Gang's ability to accurately analyze the vegetation + soil samples he will be taking and some statement of the frequency of these samples being taken.

(3) Also probably should address the need for some routine (if at least initially) sampling of the processed milk at the neighboring dairy.

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