

MAY 16 1985

Docket No. 70-371

License No. SNM-368

UNC Naval Products,
Division of UNC Resources, Inc.
ATTN: Mr. G. O. Amy
President and General Manager
67 Sandy Desert Road
Uncasville, Connecticut 06382

Gentlemen:

Subject: Inspection Report No. 70-371/84-12

This refers to your letter dated March 5, 1985, in response to our letter dated February 5, 1985.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

With regard to Item 3 of your response, it is the position of the Nuclear Regulatory Commission that it is inappropriate for a shipper to declare, after the act of shipment, that alternative requirements could have been applied, in lieu of those which were actually applied (i.e. material that is packaged, labeled as radioactive material, identified on the manifest as such, and delivered to a carrier for transport, shall be subject to the applicable NRC/ DOT regulations).

Your cooperation with us is appreciated.

Sincerely,

Original Signed By: *R. Bellamy*

for Thomas T. Martin, Director
Division of Radiation Safety
and Safeguards

cc:
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
State of Connecticut

OFFICIAL RECORD COPY

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UNC Naval Products, Div. of UNC Resources 2

bcc:
Region I Docket Room (with concurrences)
T. C. Elsasser, DRP

RI:DRSS
PClemens
4/15/85

RI:DRSS
MShanbaky
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5/13/85

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Martin
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UNC NAVAL PRODUCTS



A **UNC RESOURCES** Company

67 Sandy Desert Road
Uncasville, Connecticut 06382

Telephone 203/848-1511

NIS-85-3-1

March 5, 1985

Glenn O. Amy
President and
General Manager

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Thomas T. Martin, Director
Div. of Engineering & Technical Programs

Subject: NRC Inspection No. 70-371/84-12

Reference: Letter, T. T. Martin to
G. O. Amy, dated 2/5/85

Dear Sir:

This letter is in response to the referenced letter, which advised us of an item of noncompliance relative to low-level waste from this facility which was inspected at Chem-Nuclear Systems' burial site at Barnwell, South Carolina. While the level of radioactivity in this material was extremely low, we nonetheless consider this situation to be serious and have taken strong corrective action to prevent recurrence, as outlined in the attachment to this letter.

I believe you will find our actions to be fully responsive to the items presented in your inspection report.

Very truly yours,

A handwritten signature in cursive script, appearing to read "go amy", is written over the typed name.

bl

Attachment

cc: R. J. Gregg
W. F. Kirk
J. J. Vickary

8503180310 3pp



RESPONSE TO NRC INSPECTION 70-371/84-12

1. Corrective Steps Which Have Been Taken and the Results Achieved:

All solidified rad waste drums prepared prior to 10-31-84 have been placed on quality hold and are in the process of being inspected for the presence of free-standing water and proper solidification using a revised inspection document prepared for this purpose.

No further solidification has been performed pending implementation of the actions described in (2.) below.

2. Corrective Steps Which Will Be Taken to Avoid Further Violations:

For each new type of rad waste designated for solidification, test runs will be made using fully representative samples of pH adjusted material. The ratio of solidification agent, rad waste material (percent solids/liquids), and water will be recorded for each test. Test specimens will be prepared until a recipe is obtained that gives acceptable results. Approval to solidify in burial drums will be given by management personnel only after verification of the quality of the solidified test samples via inspection and testing as necessary.

Special inspection drums will be available for use in the solidification process. These drums shall have removable bottom bungs for probing the solidified waste from the bottom. A sufficient number will be used to provide assurance that the actual production solidification has not varied from the approved test solidifications before changing to unbunged drums.

The degree of solidification will be determined by production personnel who shall document their inspections. Checking will be accomplished by:

- (a) Visual examinations for the absence of free-standing water.
- (b) Mechanically striking the top surface with a metal bar and mallet.
- (c) Probing the bottom of the solidified waste via an inspection port incorporated for this purpose (when bungs are present in bottom).

Prior to final sealing the drum, a confirming inspection will be done by an individual who did not participate in the drum solidification. The results of this inspection shall be documented. Acceptable drums will be released for closure and shipment.

RESPONSE TO NRC INSPECTION 70-371/84-12

2. (cont'd.)

Solidified rad waste drums cannot be incorporated into a burial shipment without all of the above verified as completed and acceptable. This verification will be made by the burial shipment coordinator, generally a member of the Nuclear Materials Control Department.

3. The Date When Full Compliance Will Be Achieved:

We are currently in full compliance.

While not intending to reduce the significance of this condition, we do feel it is appropriate to note that the level of radioactivity in the items noted was so low as to not be considered a "radioactive material" under Department of Transportation Regulations 49CFR 173.403(Y); and meets the average concentration requirements of 10CFR 20, Appendix B, Table I, Column 2 for discharge to a sanitary system without further dilution.