

JUL 03 1985

Docket No. 70-1100

Combustion Engineering, Inc.  
ATTN: Mr. H. V. Lichtenberger  
Vice President - Nuclear Fuel  
Nuclear Power System .. Manufacturing  
P.O. Box 500  
Windsor, Connecticut 06095

Gentlemen:

Subject: Inspection 70-1100/84-05

This refers to your letter dated December 13, 1984, in response to our letter dated December 6, 1984.

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 respect to Item A, we have re-examined this violation and concur with you that Section 4.1.3 of your approved license application authorizes you to make changes in processes, equipment and/or facilities when such changes are documented and approved by the proper personnel and the changes are within the purview of Section 4.2 of the license application. We have determined that the demarcations on the pellet shop mezzanine floor were removed after such a change had been prepared and properly approved as required by Section 4.1.3 of your approved license application. As a result of our re-examination, this violation is rescinded and our records will be revised accordingly.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
Thomas T. Martin

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

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

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PDR ADOCK 07001100  
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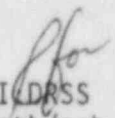
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06/26/85


IE:05


Combustion Engineering, Inc.

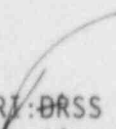
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bcc:  
Region I Docket Room (w/concurrences)  
Senior Operations Officer (w/o encl)  
N. Ketzlach NMSS  
J. Roth

  
RI:DRSS  
Roth/gcb  
6/27/85

  
RI:DRSS  
Keimig  
6-27-85

  
RI:DRSS  
Joyner  
7/1/85

  
RI:DRSS  
Martin  
7/2

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RL CE POWER - 0002.0.0  
06/26/85

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December 13, 1984

License SNM-1067  
Docket 70-1100

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

Attention: Edward C. Wenzinger, Chief  
Projects Branch No. 3  
Division of Project & Resident Programs

Reference: Letter from Edward C. Wenzinger, NRC, to H. V. Lichtenberger, CE,  
dated December 6, 1984; Inspection No. 70-1100/84-05

Dear Mr. Wenzinger:

This is in reply to the above referenced letter in which you reported that as a result of your inspector's visit to our facility on October 15-19, 1984, certain of our activities were not conducted in full compliance with NRC requirements. Our response to the notice of violation, identified as Appendix A to your letter, is as follows:

Appendix A - Item A

Section 4.2.6 "Interaction Criteria" of Part I (Criteria) of your approved license application dated April 6, 1982 specifies the spacing requirements for a 10.5 inch diameter by 17.7 inch long cylinder as 7.4 ft<sup>2</sup>. Section 4.2.6 further states that in cases where the spacing extends beyond the equipment boundaries, the spacing boundary shall be indicated with a colored line (on the floor).

Contrary to the above, on October 18, 1984, at least eight 10.5 inch diameter by 17.7 inch long cylindrical hoppers were located on the pellet shop mezzanine in appropriate storage locations. However, the spacing boundaries (in this case 7.4 ft<sup>2</sup>), which extended beyond the equipment boundaries, were not indicated with a colored line on the floor.

Response

Section 4.1.3 "Request for Changes and Criticality Analysis" of Part I (criteria) of our approved license application, dated April 6, 1982, allows us to make changes in process, equipment, and/or facilities as long as such changes are documented and approved by the proper personnel. The spacing boundaries (painted floor lines) were removed after such a change request had been prepared and approved. What the inspector objected to was that a detailed nuclear safety calculation had not been made even though we felt that such calculations were unnecessary. However, the requested calculations have been performed and have been properly documented and filed for future reference by the inspector.

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Appendix A - Item B

Section 4.3, "Specific Criticality Safety Criteria," of your approved license application (Part I - Criteria) dated September 16, 1983 states in paragraph 4.3.8 that each storage position in the concrete block storage area shall be limited to one container.

Contrary to the above, on October 18, 1984 three storage positions in the concrete block storage area located in the pellet shop annex contained two containers filled with low enriched uranium-bearing material.

Response

The nuclear safety sign in the concrete block storage area has been changed to make it more explicit. In addition, employees have been reinstructed on the type(s) and quantity of SNM that may be placed on storage shelves.

Appendix A - Item C

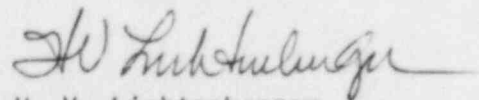
10 CFR 70.3 "License requirements" states that no person subject to the regulations in this part shall receive title to, own, acquire, deliver, possess, use, or transfer special nuclear material except as authorized in a license issued by the Commission pursuant to these regulations. Materials License SNM-1067 dated March 14, 1983 in License Condition 6 restricts the uranium possessed by the licensee to a maximum of 20 wt % U-235.

Contrary to the above, between April 1, 1982 and October 19, 1984, the licensee possessed approximately 500 grams of U-235 in uranium enriched up to 81 wt % as contaminated residuals from previously authorized operations. Possession of this special nuclear material was not authorized by the specific license, SNM-1067, issued to Combustion Engineering, Incorporated.

Response

An amendment to SNM-1067 requesting approval for us to possess 1000 grams of U-235 ". . . enriched to or greater than 20 weight percent U-235" was submitted to the NRC on November 30, 1984.

Very truly yours,



H. V. Lichtenberger  
Vice President, Manufacturing  
Nuclear Power Systems Division

HVL/RES/ssc