

October 17, 1996

Mr. Raymond Pierce
Maintenance Supervisor
Glenville Enterprise Center
540 East 105th Street
Cleveland, OH 44108

SUBJECT: NRC INSPECTION CONDUCTED AT THE FORMER CLEVITE
CORPORATION FACILITY LOCATED IN CLEVELAND, OHIO;
REPORT NO. 070-00133/96001(DNMS)

Dear Mr. Pierce:

This refers to the routine inspection on August 29-30, 1996, at the facility formerly occupied by the Clevite Corporation located at 540 East 105th Street, Cleveland, Ohio. The results of the inspection were discussed with Mr. Rory Grube at the conclusion of the inspection on August 30, 1996.

The site characterization is completed. Remediation was in progress, but is on hold pending NRC approval of the Site Characterization Report. In general we found your decommissioning program to be acceptable; however, our record reviews indicated that the contractor had not implemented the following parts of the Health and Safety Plan which is part of the *Site Characterization Survey, Contamination Survey, Remediation, and Health and Safety Plan* for the Former Clevite Corporation Site:

1. Requirements for Health Physics Technician Training, Page 23
Section D of the Health and Safety Plan, states that "Successful completion of Radiation Worker training is required" and "Successful completion of a written examination with a passing score of 80 percent is required."

The contractor's health physics technicians have not completed the radiation worker training. The technicians were exempted from the training by the contractor based on previous training and experience. However, there was no provision for exemption of personnel from this training in the Health and Safety Plan.

2. There is a requirement on Page 29 of the Health and Safety Plan which states that "A daily radiation safety report will be submitted to the Gould representative for review"

A contractor's representative indicated that daily radiation safety reports are not prepared; however, the Gould representative was kept informed but this process was not formally documented.

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3. The Remediation Plan Revision (page 1, attachment 1, number 7) called for weekly radiation surveys of "selected buildings and work areas outside the restricted area fence on a rotating basis."

These surveys had not been conducted. A contractor representative stated that this requirement was an administrative error and that there was never any intention to survey areas outside of the fenced area which is the site boundary.

Although the lack of compliance to the above mentioned requirements of the Health and Safety Plan did not appear to have a detrimental effect on the safety of the working environment for on-site personnel, the contractor should implement all of the requirements of the Health and Safety Plan as submitted to and approved by the NRC. Those portions of the plan which the contractor believes are not applicable, obsolete, or redundant should be identified and justification provided to us for removing them from the Health and Safety Plan.

Because neither you nor the contractor are NRC licensees, this is not considered a violation of NRC requirements. However, we are concerned about these issues. It has been the NRC's policy to generally not require non-licensed site owners or contractors to possess an NRC license to conduct decommissioning work; however, we do expect that non-licensees', or its contractors', radiological controls program to be implemented and comply with the NRC's regulatory requirements in 10 CFR Part 20 as well as the approved Health and Safety Plan. We are requesting that you provide us with a written response within 45 days from the date of this letter describing what actions will be taken to ensure compliance with the Health and Safety Plan.

The NRC will determine the releasability of the building for unrestricted use when the remediation is finished and independent measurements have been performed by us or our contractor, Oak Ridge Institute for Science and Education (ORISE). Following this confirmatory inspection, the NRC Project Manager in the Office of Nuclear Material Safety (NMSS) will provide you a copy of the subsequent confirmatory inspection report, and will inform you by letter of the NRC's determination on whether the building and soil areas are releasable for unrestricted use.

In response to a question from one of your tenants, Mr. John Arnold of Production Machine Company, concerning radiological contamination, we performed a survey of that portion of the facility occupied by the tenant. Results of the radiological surveys and smears that were taken indicated that only background radiation levels exist in this area.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

If you have any questions please contact Dr. J. E. House at (630) 829-9824 or Mr. J. W. McCormick-Barger. Chief, Decommissioning Branch at (630) 829-9872.

Sincerely,

Original Signed by R. Caniano for

Cynthia D. Pederson, Director
Division of Nuclear Materials Safety

Docket No. 070-00133 (Terminated)
License Nos. SNM-00183 (Terminated)
C-3692, C-3790 (Terminated)
34-00653-01/02 (Terminated)

cc w/o encl: L. Weinstein, Esq.
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