

**Wheeling Pittsburgh**  
STEEL CORPORATION

May 10, 1985

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

Att: Mr. John D. Kinneman, Chief  
Nuclear Materials Section A

Re: WHEELING-PITTSBURGH STEEL CORPORATION  
NRC INSPECTION NO. 30-19918/84-01  
LICENSE NO. 47-16875-02

Gentlemen:

We would like to take this opportunity to offer our response to the Notice of Violation received at our Monessen, Pennsylvania facility.

We have reviewed our License No. 47-16875-02, Condition No. 15, and feel that our interpretation of the condition appears not to be consistent with that of the Commission. Our interpretation of installation of the licensed device includes the initial handling (i.e., unpacking, placement, radiation survey, etc.) of the device and startup of the associated electronic components of the Berthold Mold Level Measuring System. This was accomplished by the manufacturer's representative during the installation process.

We interpret item No. 9 of our license to mean that we must use the device according to the conditions of the license. These conditions we believe would include the routine removal and reinsertion of the device into the molds due to the inherent nature of the casting process. Item No. 9 specifically authorizes Wheeling-Pittsburgh Steel to use the device in the Berthold Mold Level Measuring System.

The system itself, due to the specific nature of the operation, requires that the device be removed routinely from the molds during mold changing procedures, specific maintenance activities, and under emergency conditions needed to eliminate the potential for radiation exposures. The periods during facility shutdowns require that the device be removed from the molds for security purposes and placed in a labeled containment box which is adjacent to the molds and is secured by locking.

We specified in our license application, submitted October 18, 1982, item No. 15, Attachment B-1, para. No. 3, that:

"A written procedure for removing and changing the source from mold to mold will be developed. This procedure will be developed in consultation with the manufacturer's representative."

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U.S. NRC

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The source referred to above should be clarified to infer the device, since source by definition is contained within the device proper.

Since the inception, Wheeling-Pittsburgh has continued to follow the safe work procedures previously developed in consultation with the manufacturer's representative. These procedures will insure proper handling of the device during routine operation of the casting process to insure that radiological exposure is maintained as low as possible. These procedures were reviewed by the NRC inspector during the inspection of November 20, 1984.

In consideration of the above, the corrective measures taken to eliminate the misunderstanding, on our behalf, will be to submit an application for an amendment to License Condition No. 15. This amendment will permit our qualified users to perform removal and reinsertion of the device into the molds due to the routine demands of the operation. The procedures to be employed during this process will follow the practices developed under the guidance of the manufacturer's representative.

The modifications to the device to assure that the handle assembly is correct will be completed during the next scheduled maintenance period. This maintenance activity will be performed only by the device manufacturer or by other persons specifically authorized by the Commission or an Agreement State to perform such services.

We trust the above explanation and proposed corrective measures to be taken will eliminate the misunderstanding that exists. Please advise if these corrective measures meet with your approval and we will proceed with the amendment submittal. We can anticipate compliance upon receipt of our license amendment as previously referenced.

If you have any questions, feel free to contact us.

Very truly yours,

WHEELING-PITTSBURGH STEEL CORPORATION



B. L. Hunt  
Industrial Hygienist  
Environmental Control

BLH/ng