December 17, 1996

Dr. Ralph J. Reda
Manager, Fuels and Facility Licensing
General Electric Company
P.O. Box 780, MC J26
Wilmington, NC 28402

SUBJECT: LICENSE RENEWAL - REQUEST FOR ADDITIONAL INFORMATION
(TAC NO. L10079)

Dear Dr. Reda:

This refers to your application dated April 5, 1996, requesting renewal of Material License SNM-1097. Our review of Chapters 1, 2, and 3, has identified additional information that is needed before further action can be taken on your renewal.

The additional information should be provided in the form of responses to the individual comments, as appropriate, or as revised pages to the application, within 30 days of the date of this letter. Please reference the above TAC No. in future correspondence related to the renewal request.

If you have any questions, please cal me at (301) 415-8134.

Sincerely,

Original signed by:

Michael Lamastra
Licensing Section 2
Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Docket 70-1113
License SNM-1097

Enclosure: Additional Information

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NAME	MLamastra/nt	PShea	GPangburn
DATE	12/17/96	12/16/96	12/17/96

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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SPECIFIC COMMENTS AND ADDITIONAL INFORMATION REQUIRED

GE-WILMINGTON RENEWAL APPLICATION

CHAPTER 1 GENERAL INFORMATION

1. Page 1.10, Section 1.3.1.2. This section should be expanded to include a commitment that accident scenarios are developed when any changes to the process are planned/implemented that may impact a structure, system, or component important to safety, even if does not involve a new technology.

2. Section 1.3.3, page(s) 1.11-1.13. Describe uses intended for this material and provide the following:

   a. Information regarding amount(s) and concentration(s) of hydrofluoric acid transferred, if varied, because generation of the acid depends on production, then provide range.

   b. A pathway analysis that shows that this material does not enter any commodity designated for ingestion or inhalation **nor is it released to the environment**. Include secondary pathway analysis of residues.

   c. A description of the shipping containers, such as size, material, liners, etc.

   d. A commitment to keep records for sampling and measurement of uranium concentrations prior to shipment.

   e. GE has been transferring nitrate-bearing liquids and CaF_2 to buyers in the paper and steel manufacturing business. However, very little information is provide for these activities in the renewal application. Therefore, the same information requested above for the hydrofluoric acid should be provided for these materials as well.

CHAPTER 2 ORGANIZATION AND ADMINISTRATION

1. General comment - overall, most positions have the qualifications (especially experience) decreased from the existing license. You should demonstrate or explain why such a decrease in the over-all experience of the staff does not adversely the safety of operations.

ENCLOSURE

2. Page 2.10, Section 2.3.1. Make the following commitments:

   a. The facility Safety Review Committee (SRC) shall include experts on operations and all safety disciplines (criticality, radiological, chemical and fire). The members and alternate members of the SRC shall have an academic degree in an engineering or physical science field and shall be appointed by the Facility Manager.

   b. The SRC shall have review meetings within 60 days after an incident which is reportable to the NRC. These meetings may be combined with regular meetings.

   c. Following the reportable event, the Committee shall review the incident causes, responses, and both specific and generic corrective actions to ensure that resolution of the problem is implemented.

   d. A written report of each SRC meeting and review shall be forwarded to the facility manager and appropriate function manager(s) within 30 days and be retained for the duration of the facility.

3. Define "area" and identify how many areas there are in the operations.

4. Provide more detail of the chain-of-command between "product line management" and "area manager." Explain if one or more product line manager is responsible for one or more area managers. In addition to providing more detail in these functions, use diagrams as appropriate.

CHAPTER 3 CONDUCT OF OPERATIONS

1. General

   a. Include description how they meet the Branch Technical Positions for Management Controls and Operations QA.

   b. In Section 3.1, the you uses the terms "important to safety" and "safety-related systems and components" but neither term is defined. Section 3.3.2 uses a different term "Safety Structures, Systems and Components" which may or may not be the same as "Safety-related" or "important to safety."

3.1.4 Clarify if Functional Test Instructions (IFIs) are included in Document Control.

3.2.1 Clarify if Scheduled Preventive Maintenance applies to instruments or equipment designated as "Active Engineered Controls" are included.

3.2.2 Same comment as 3.2.1.

3.4 Clarify if training meets requirements of 10 CFR 19.12 for employees. Define how the training meets ANSI 8.20 for nuclear criticality safety training.

3.4.2 Clarify what sort of refresher training or training following changes will be provided to operators.

3.6.3 Specify a minimum frequency for independent audits.

3.7 Clarify how the requirements of NRC Bulletin 9101 - are incorporated intc Incident Investigations.

3.9.2 Include a generic statement about the licensee's policy concerning mandatory compliance with the requirements of procedures.

Also, specify a minimum frequency for periodic review of operational procedures if they are not changed.

2. Page 3.6, Section 3.4. Add the following: (a) training in 10 CFR Part 19; (b) environmental protection and; c) risks involved in receiving chronic low level exposure to soluble uranium compounds and byproducts of reaction with ambient moisture, as well as other chemicals involved in processes under the NRC regulatory confines.

3. Page 3.8, Section 3.6.1.

   a. QA personnel should be included in safety audits.

   b. Audited organization will inform auditing organization of schedule for completion of corrective actions. Notification should be given within 30 days of the audit and tracked to completion by individual designated by the QA group.

4. Page 3.9, Section 3.6.3, first paragraph.

   GE is involved in activities handling radioactive material in chemical processes. Independent audits must be conducted for areas covered under the ISA. The applicant's limitation of the independent audits to only two areas, the radiation and criticality safety programs, severely hinders the purpose of audits and ignores activities significant to plant safety.

5. Page 3.11, Section 3.8, second paragraph.

   If a list of records is to be provided, it should specifically identify retention periods and it should be a more comprehensive listing than provided in the application.