

June 26, 1974

George Smith, Field Support & Enforcement Branch, RO:HQ

**ISOMEDIX REQUEST FOR LICENSE AMENDMENT - JUNE 24, 1974**

The following are Region I comments on Isomedix's requested changes to their current license. Please note those which we consider of major importance have been checked (✓).

**Page**

48, 52, 59

References to alarm defeat switches have not been removed. It is stated on p. 32, item b, that these have been eliminated.

- ✓ NO's position is no alarm defeats and that the license should be cleared of all references to defeats.

60 - 62

Emergency procedures for malfunctions in hot cells imply they may be implemented without prior approval by RFO and may be conducted as one-man operations.

- ✓ No emergency procedures should be attempted to correct hot cell malfunctions until the RFO has been notified, has reviewed the situation, approves the action and is present during the action.

59, reference p. 58

Emergency procedures for employees, in the event of a low pool or radiation alarm, is to evacuate building or assemble in a specified area (p. 58). However, later (p. 59) it is implied that personnel evacuate only if the cause of an alarm is not immediately determined and controlled. How do personnel know this?

- ✓ Remove implied qualification of evacuation procedures on p. 59 and require evacuation whenever alarm sounds unless preceded by an announcement that a test of the alarms is being conducted.

62

RFO is stated as the individual who notifies authorities as required. Who acts in his absence? (This was a problem at 6/13/74 incident since the RFO was not available, and as a result, the AEC was not notified).

- ✓ Provide alternate designees who will be responsible for notifying the authorities when the RFO is unavailable.

8507200359 850510  
PDR FOIA  
GLOWACK85-111 PDR

*Sent by facsimile 6/26/74*

871  
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**PAGE**

48, 49, Weekly Oper.  
Check List (pp 50 - 51)

Statements and checklists are provided relative to inspections and checkouts of safety systems but individuals responsible for these are not identified.

✓ State who is responsible for performing and for insuring visual inspections, daily operational checks, weekly checks, monthly and quarterly checks.

no page no.  
Section 14.6.1  
"Special Training"

Minimum frequencies for training and retraining, and for meetings of the Diets, Owens, Karl and Perrin Committee are not specified.

✓ Employees should be formally reinstructed at least on annual basis and formal reviews of operations be conducted at least monthly.

n/a - no reference  
in document

✓ Type of Survey Meter should be specified.

28

Instructions for unloading cask in hot cell, specifically for surveying interior of cask for contamination are vague. How will this be done? It implies a transfer of wipes out of the cell.

28, also Section 13.9.8  
"Procedure to move  
sources between cells"

Instructions for unloading cask in storage pool should be prefaced "this is a two man operation" as are other two man operations procedures.

no page no.  
Section 13.9.6.b  
"Cell #2 Operator  
Instructions"

Questions Can the key for the source hoist be removed before completing ascent or descent of source? If so, what happens to the interlock system?

Also, 10 millirad/hour is cited as upper permissible limit as measured with survey meter when opening cell door and checking levels inside. This seems high. Note, under above comments, that the type of survey meter has not been specified by licensee. A GM rate meter is not thought to be a suitable instrument.

Page

no page no.  
Section 13.9.8  
"Procedure to move  
sources between  
cells", item 9

p. 50, item 6 & 7

McClintock 6/20/74  
memo to Gen Roy

What is the key interlock on the sliding  
door on the pass through port?

Insert between items 6 & 7 a step requiring  
a physical survey with meter to insure  
source is down prior to proceeding with test  
of door check system.

The recommendation that the operating keys be  
fastened to the survey meter is not spoken to  
in this document. I do not believe this is  
necessary.

Paul R. Nelson, Chief  
Radiological and Environmental  
Protection Branch

cc: Gen Roy

Lubenau  
6/26/74

Nelson  
6/26/74

TO: W.P.C. 215, RO  
FROM: C. GUSTIN, OIS

W85  
GK  
600

File

AEC PROPOSES \$2,050 CIVIL PENALTY AGAINST ISOMEDIX

The Atomic Energy Commission's Director of Regulatory Operations has proposed imposing civil penalties amounting to \$2,050 against Isomedix, Inc. of Parsippany, New Jersey, for apparent violations of AEC Regulations.

The apparent violations were identified during inspections on June 14, 18 and 28 after an Isomedix employee was exposed to excessive radiation. The employee, who was hospitalized after the overexposure, has returned to work.

Also on June 14 the Director of Regulatory Operations suspended the use of radioactive material at the plant after concluding that a potentially hazardous condition could exist. The suspension was lifted on July 8 after AEC inspections of additional safety equipment and revised operating procedures.

*in hurry, this  
is fine  
not a violation*

~~During the three days of inspections~~  
AEC inspectors identified none apparent violations during the three days of inspections. Proposed fines against Isomedix range from \$50 to \$1,000 for eight of the violations including the overexposure. Other violations include inadequate training of radiation workers, failure to follow proper procedures in using radioactive material, and inadequate and ineffective radiation alarm and monitoring systems.

Isomedix has already taken corrective action on the nine violations and their comments on five of them have been reviewed



and approved by AEC inspectors. Final documentation on the other four violations is to be submitted within twenty days of receipt of the Notice of Violation.

In a letter to the company regarding the proposed fine, the Director of Regulatory Operations expressed concern about Isomedix' management control system in not preventing the violations from occurring. He has asked for a description of actions taken to improve the system.

The company was given 20 days in which to either pay the fines or protest them, all or in part, giving reasons why the penalties should not be imposed.

The State of New Jersey has been notified of the proposed enforcement action.