

APPENDIX A

NOTICE OF VIOLATION

Combustion Engineering, Inc.
Windsor, Connecticut 06095

Docket Nos. 70-1100; 30-3574
License Nos. SNM-1067; 06-00217-06

As a result of the inspection conducted on May 20-24, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified: Items A to E are violations of License No. SNM-1067, Item F is a violation of License No. 06-00217-06.

- A. Section 4.3, "Specific Criticality Safety Criteria", of your NRC approved license application (Part 1-Criteria), dated September 16, 1983, states, in paragraph 4.3.15, that fuel assemblies shall be stored only in the positions described in Drawing NFM-E-4229, Revision 2, dated August 24, 1981. Drawing NFM-E-4229 specifies a ten inch center-to-center distance between fuel assemblies.

Contrary to the above, on May 21, 1985, the center-to-center distance between fuel assemblies stored in the vertical position was less than ten inches (about 9.75 inches) at the top of the assemblies in three locations (Row D, Location 10-11; Row K, Location 13-14; and, Row N, Location 18-19).

This is a Severity Level IV violation (Supplement VID).

- B. Section 4.14, "Posting of Limits", of your NRC approved license application (Part 1-Criteria), dated June 15, 1984, states, in part, that all work stations and storage areas shall be posted with a nuclear safety limit approved by the Manager NLSA&S or the Nuclear Criticality Specialist.

Contrary to the above, on May 21, 1985, all work stations were not posted with nuclear safety limits approved by the Manager NLSA&S or the Nuclear Criticality Specialist in that two trays of Quality Control pellet samples were stored on a cabinet next to the table/scale inspection work station at the east end of the pellet shop and an unauthorized 2 inch by 3 inch tray of pellets was located inside the enclosure for pellet press number 3. The cabinet was not posted with nuclear safety limits for storage of fuel pellets and the nuclear safety limits on the posting for the pellet press did not authorize the 2 inch by 3 inch tray of pellets in the pellet press enclosure.

This is a Severity Level IV violation (Supplement VID).

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- C. Section 2.7, "Operating Procedures", of your NRC approved license application (Part 1-Criteria), dated June 15, 1984, states, in part, in paragraph 2.7.2, that it shall be the responsibility of the General Manager (NFM) to assure that all operations involving radioactive materials have written procedures which are followed. Step 4.10 of Operations Sheet No. 599 (a written procedure) for the Screening Hood states that when sufficient oversized material is available, refire the UO_2 . Log the weight on the log sheet as weight out. Adjust the net weight by subtracting the weight out to give a new net weight. Step 4.1 of Operations Sheet No. 1518 (a written procedure) for the Micronizer required the operator to record the weight of UO_2 that is to be micronized in the micronizing material balance log book.

Contrary to the above, on May 20-21, 1985, the General Manager (NFM) did not assure that written procedures were followed in that the quantity of oversized material removed from the screening hood was not logged out and a container of 24,660 grams of UO_2 located in the micronizer was not recorded in the micronizing material balance log book.

This is a Severity Level IV violation (Supplement VID).

- D. License Condition 18 states that the instruments measuring the liquid-waste level in each dilution tank prior to discharge to the Farmington River shall be calibrated at least annually.

Contrary to the above, the instruments measuring the liquid-waste level in each dilution tank were not calibrated at least annually between April 27, 1984 and May 24, 1985, a period exceeding one year.

This is a Severity Level V violation (Supplement VIE).

- E. 10 CFR 70.41(a), "Authorized Use of Special Nuclear Material", states, in part, that each licensee shall confine the possession and use of special nuclear material to the locations and purposes authorized in the facility license.

Contrary to the above, on May 22, 1985, the licensee did not confine the possession and use of special nuclear material to the locations authorized in the facility license in that trailer No. 409, containing unmeasured SNM in internally contaminated equipment, was stored on a former waste storage pad which was not identified in the facility license as an authorized storage location.

This is a Severity Level V violation (Supplement VIE).

- F. License Condition 13C of Materials License No. 06-00217-06, dated February 12, 1985, requires, in part, that each source designed for the purpose of emitting alpha particles be tested for leakage at intervals not to exceed three months.

Contrary to the above, a ten microcurie americium-241 source (No. CE-5), which was designed for the purpose of emitting alpha particles, was not tested for leakage between December 27, 1984, and May 20, 1985, an interval exceeding three months.

This is a Severity Level IV violation (Supplement VID).

Pursuant to the provisions of 10 CFR 2.201, Combustion Engineering, Inc. is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.