



UNITED STATES  
ATOMIC ENERGY COMMISSION  
DIRECTORATE OF REGULATORY OPERATIONS  
REGION II - SUITE 818  
230 PEACHTREE STREET, NORTHWEST  
ATLANTA, GEORGIA 30303

TELEPHONE (404) 828-4503

12/4/74

R. H. Engleken, Director, Region V, Directorate of Regulatory Operations

INSPECTION - CHEM-NUCLEAR SYSTEMS, INC., BELLEVUE, WASHINGTON (BARNWELL,  
SOUTH CAROLINA, BURIAL SITE) LICENSE NO. 46-13536-01

Enclosed is a draft enforcement letter to the subject licensee.

Although we found two violations during the inspection, neither involved a health and safety problem. We believe that the licensee's environmental sampling program as now being conducted is adequate to detect migrations of the buried wastes but is inadequate in that it does not meet the requirements found in Appendix 6 of the license. Also, although the licensee is exceeding the 15 grams of uranium 235 per package limit established in Condition 1C of the license, we found no evidence that this had created any safety problems. The total amounts of uranium 235 possessed at any one time had been limited to 350 grams but with individual packages containing up to 50 grams of uranium 235. These were the limits previously stipulated in the State of South Carolina license.

For your information we are enclosing a copy of our draft inspection report which was submitted to J. G. Davis on November 27, 1974, pursuant to his memorandum of November 25, 1974.

Norman C. Moseley  
Director



DEC 4 1974

R. H. Engleken, Director, Region V, Directorate of Regulatory Operations

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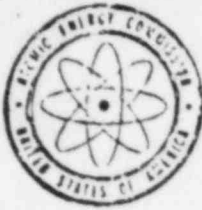
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Original  
J. G. Moseley

Norman C. Moseley  
Director

OFFICE	RO:II	RO:II	RO:II		
SURNAME	PRGuinn:pw	JTSutherland	NCMoseley:pw		
DATE	12/4/74	12/4/74	12/4/74		



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REGION II - SUITE 818  
230 PEACHTREE STREET, NORTHWEST  
ATLANTA, GEORGIA 30303

TELEPHONE 14641 828.45

In Reply Refer To:  
RO:II:PRG  
74-01

Chem-Nuclear Systems, Inc.  
Attn: Mr. Bruce W. Johnson, President  
P. O. Box 1866  
Bellevue, Washington 98009

Gentlemen:

This refers to the inspection conducted by Messrs. P. R. Guinn and G. L. Troup of our Region II office on November 26, 1974, of activities authorized by AEC Byproduct, Source and Special Nuclear Material License No. 46-13536-01 at your Barnwell, South Carolina burial site, and to the discussions of our findings held by Messrs. Guinn and Troup with Thomas J. McCord at the conclusion of the inspection.

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of your license. The inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspector.

During the inspection it was found that certain activities under your license appear to be in violation of AEC requirements. The violations and references to pertinent requirements are identified in the enclosure to this letter.

This notice is sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within 20 days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you, 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.

Chem-Nuclear Systems, Inc.

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You should note that this letter and your reply to this letter will be disclosed to the public by being placed in an AEC Public Document Room.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Very truly yours,

R. H. Engelken  
Director

cc: N. C. Moseley, Region II  
T. J. McCord, Chem-Nuclear

ENCLOSURE

License No. 46-13536-01

Certain activities under your license appear to be in violation of regulation requirements as indicated below:

Violations considered to be of Category II severity were as follows:

- A. Condition 1C of the license establishes the requirement that up to 850 grams of uranium 235 may be possessed at any one time provided that no single package contains more than 15 grams of uranium 235.

Contrary to the above, on numerous occasions since July 1, 1973, packages of wastes for burial have been received which contained more than 15 grams of uranium 235. Included in this total were 91 packages received during the period of October 18 through October 31, 1974, which contained from 15.1 to 49.0 grams each of uranium 235.

- B. Condition 2 of the license references the application dated November 18, 1971, and the ammendment dated February 24, 1972, which establish the requirement in Appendix 6 that the environmental monitoring program shall include sampling and analysis of water, soil, vegetation and animal material at established frequencies and locations.

Contrary to the above, the environmental monitoring program being conducted is not of the prescribed scope in that the required number of wells and municipal water supplies are not being sampled and no animal material sampling has been conducted.