



November 8, 1996  
696-2647

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

**Subject:** Reply to a Notice of Violation; SNM-696; Docket No. 70-734

**Reference:** NRC inspection Report 70-734/96-03 and Notice of Violation, dated October 10, 1996

During an NRC inspection conducted on September 16-20, 1996, one violation of NRC requirements was identified (Ref.). This letter is General Atomics' (GA's) reply to the referenced notice of violation. The violation is stated below followed by GA's response:

**Statement of Violation:**

Safety Condition S-23 of SNM License 696 requires the licensee to maintain and execute the response measures described in the Emergency Plan [Radiological Contingency Plan] dated August 1995 and revisions thereto.

Section 4.1.4, "Primary Support Group Emergency Response Organization," of the licensee's Radiological Contingency Plan states, in part, "Members of Emergency Response Teams are trained in those subjects deemed appropriate for their facility (such as basic first aid, ..., and the use of self-contained breathing apparatuses)."

Section 10.2, "Training" of the licensee's Radiological Contingency Plan requires annual training of emergency response team members, and that the annual retraining is not to exceed 15 months from the previous training.

Contrary to the above, during the period of March 23, 1995, to September 20, 1996, no annual refresher training had been given on the use of self-contained breathing apparatuses to emergency response members designated to use such devices.

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

**GA's Response:**

(1) Reason for the violation: The required training associated with the use of self contained breathing apparatus (SCBA) was previously provided by GA's Emergency Services organization. The Emergency Services (ES) organization was discontinued in 1995 consistent with significant reductions in GA's scope of operations and downsizing and the availability of emergency response assistance from nearby city fire stations. After the staff reduction associated with the elimination of the ES organization, the person who had held the position of Supervisor of ES was retained temporarily (as a contract employee) to function as a fire protection specialist and emergency response trainer during a transition period. Due to demands on his time he did not conduct the

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SCBA training session due in March - June 1996. However, because of his presence on site, it was believed that the former supervisor of ES was still performing the training; when actually he was not. This failure to communicate and clearly assign responsibility for assuring that SCBA training was conducted during the transition period following the elimination of ES resulted in the violation. More recently, the transition period ended and the former supervisor of ES was terminated from employment at GA.

(2) Corrective steps that have been taken and the results achieved: All Emergency Response and Recovery Directors were requested to perform, and have completed, a re-evaluation of the emergency response team membership and training requirements for the facility for which they are responsible. GA's Industrial Hygienist was assigned the responsibility to arrange for a qualified trainer to conduct training for all GA emergency response personnel who are identified as being required to have training associated with the use of SCBA. This training was conducted by Mr. Edward Bonnett (a certified industrial hygienist with training experience) of Bonnett Environmental Engineering, Inc. on October 30, 1996. All emergency response personnel who are identified as being required to have SCBA training have, in fact, now been trained.

(3) Corrective steps that will be taken to avoid further violations: GA's Industrial Hygienist has been assigned the responsibility to assure that future required SCBA training is conducted in a timely manner. The spreadsheet which provides training status information for emergency response team personnel will continue to be maintained by GA's Health Physics organization and routinely provided to GA's Industrial Hygienist for use in scheduling future required training sessions.

(4) Date when full compliance will be achieved: General Atomics is currently in full compliance.

GA trusts that you will find this reply responsive and satisfactory. If you should have questions or require additional information, please do not hesitate to contact me at (619) 455-2823.

Very truly yours,



Dr. Keith E. Asmussen, Director  
Licensing, Safety and Nuclear Compliance

KEA:shs

cc: Regional Administrator, Region IV  
Materials Branch Chief, Region IV, WCFO  
Dr. Gerard Wong, State of California