

November 5, 1996

Certified Mail:
P-466-673-305

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

Re: Reply to a "Notice of Violation"

Dear Sirs:

This letter is our response to the "Notice of Violation" received in NRC Inspection Report No. 04-03392/96004 (DNMS) dated October 10, 1996.

• **Violation No. 96004-01:**

Condition 11 of Source Material License SUB-526 requires the licensee to maintain and execute the response measures in the Radiological Contingency Plan dated August 15, 1993.

The Radiological Contingency Plan (RCP), Section 3.2.2, "Alert Response Actions," requires notification of the NRC Operations Center within one hour of declaring an Alert.

Contrary to the above, on September 9, 1996, the licensee declared an Alert at 5:15 p.m., but did not notify the NRC Operations Center until 6:26 p.m., a period exceeding one hour.

Reason for Violation:

The release occurred at a time of day when most of the RCP officers were driving home from work and so could not be contacted on the initial phone call. As a result, off-site reporting was not completed in a timely manner.

Corrective Action(s):

To ensure timely off-site notification two actions have been taken:

- ⇒ Two pagers have been purchased for the purpose of contacting key RCP Officers when they are not at work or home. Two of the three people qualified to perform the Emergency Response Officer and Radiation Officer positions will carry those pagers. Instructions for contacting those people through the pagers have been included in the "Contingency Call List" in Appendix B of the RCP.

Completed: October 1, 1996

- ⇒ Refresher training is being conducted for all RCP Officers. During that training, the off-site notification requirements are being emphasized.

Estimated Completion: November 15, 1996

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Violation No. 96004-02:

Condition 10, "Authorized Use," of Source Material License SUB-526 requires the licensee to use natural uranium compounds in accordance with the statements, representations, and conditions contained in Chapters 1 through 7 of the license renewal application dated July 11, 1994, with supplements.

Section 2.6 of Chapter 2 of the application requires, in part, that plant operations be conducted in accordance with Standard Operating Procedure Manuals which provide detailed instructions for proper operation of each production unit.

Contrary to the above, as of September 9, 1996, the licensee did not provide detailed instructions in the Distillation Manual for proper operation of the vaporizer and nitrogen header during a system purge. Specifically, an action step (instruction) was not provided detailing the acceptance criteria for a minimum nitrogen pressure or the pressure difference between the vaporizer and nitrogen header prior to purging. Failure to assure the proper pressure difference resulted in a uranium hexafluoride release.

Reason For Contesting Violation:

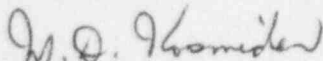
The licensee respectfully contests this violation. The procedure for flushing the vaporizer which was included in the Distillation Manual prior to the September 9, 1996 UF₆ release, contained all of the information necessary to perform this task safely. During questioning by the NRC inspector, the operator also said that he believed he had the proper information and training necessary to perform the task safely. However, the operator who performed the task which resulted in the UF₆ release failed to fully follow that procedure. For his failure to follow the procedure, the operator received appropriate disciplinary action. The procedure was not the root cause of the release; rather, the operator's inattention to detail was the root cause.

To further strengthen the procedure itself, it was rewritten to require a minimum acceptable nitrogen pressure of 90 PSIG before the procedure can be performed. All qualified distillation operating personnel have been trained in this procedure change.

Completed: November 1, 1996

If there are any questions, please contact Mr. H. C. Roberts at (618) 524-6349 or me at (618) 524-6220.

Sincerely,



M. D. Kosmider
Plant Manager

MDK/sm

cc: W. Murrell - (NIC-4)
M. Shepherd
P. Gasperini
J. Pratte
H. Roberts
J. Alcorta
J. Graham - ConverDyn

U.S. Nuclear Regulatory Commission
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