

11/15/96

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

30-31355

Subject: Reply to a Notice of Violation

Attn.: Document Control Desk

Dear sirs,

This letter is in reference to the violation incurred by CertainTeed on the NRC inspection dated September 3, 1996.

In response to Violation #1:

Condition No. 18 of license No. 34-26073-01 requires that the licensee shall assure that the shutter mechanism is locked in the closed position during periods when a portion of an individual's body may be subject to the direct radiation beam.

Response to violation #1:

The violation occurred because of improper training procedures given to plant personnel. With the alarms active to tell personnel whether the source was "on" or "off" they felt comfortable without the lock out procedure of the gauge. They knew that if the alarm were to sound while inside of a vessel that would mean the gauge shutter had been moved back to the "on" position and provide warning to remove themselves from the vessel. The problem with this is that temporary downtime or power loss would disable the alarm and put personnel in danger of exposure.

Corrective action to violation #1:

Lock outs have been assigned for all gauges requiring manual positioning of the gauge shutter. New lock out procedures have been established so that locks will not be removed and the gauge shutter moved to the "on" position unless the gauge is an active participant of the process. There are only two keys for each gauge, one for line supervisors and one in the office of the RSO.

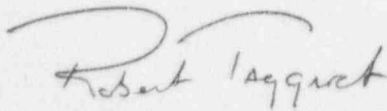
concerned, and updated every year. We also plan to distribute a safety video throughout the year, which will be viewed during crew meetings, in order to keep employees up to date and aware of operating procedures concerning our Radiation Safety Program.

Date when full compliance will be achieved for Violation #2:

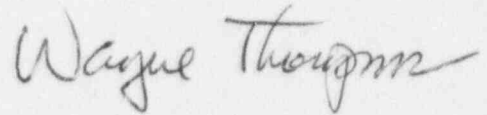
Expected date for training all CertainTeed employees has been set for 01/15/97.

I have included a training manual along with this letter of response for your review. Please do not hesitate to contact me if you have questions or suggestions pertaining to this letter or our new training program.

Sincerely,



Robert Taggart  
Project Engineer / RSO



Wayne L. Thompson  
Plant Manager

CC:  
Regional Administrator  
Region III  
801 Warrenville, Rd, Lisle, Illinois  
60532-4351

Corrective steps to avoid further violation of Violation #1:

All employees will receive training outlining the new lock out procedure. Manuals will be issued to all employees and a training period of two months is expected to complete training of all CertainTeed employees. Until all training has been completed, lock out procedures will be strictly enforced by the plant RSO, Robert Taggart, who will personally supervise all device lock out until deemed unnecessary.

Date when full compliance will be achieved for Violation #1:

Expected date of full compliance will be set for 01/15/97.

In response to Violation #2:

Condition No. 19 of license No. 34-26073-01 requires that the licensee conduct its program in accordance with the statements, representations, and procedures contained in an application dated October 6, 1989.

Response to Violation #2:

This violation occurred because no training program had been established for CertainTeed employees during a period where John Staskiewicz was responsible for Radiation Safety Program at the Avery plant site. Training was given only to those in maintenance who were available for gauge installation and then passed on to those in production. Word of mouth was the only official training that existed.

Corrective action to Violation #2:

We have set up a training program for all CertainTeed employees that will establish a firm set of rules and regulations concerning interaction with these nuclear devices. All employees will be introduced to radiation exposures related to all nuclear devices as outlined in the training manual supplied along with this letter of response. All employees will be made aware of the locations and shutter mechanism alarms and lights defining shutter positions. Lastly, This training will be performed on an annual basis, and given to new employees as part of their initial safety training.

Corrective steps to avoid further violation of Violation #2:

Once employees have completed the training required they will be asked to sign a paper which states that they have received the necessary training. These will be filed in the Radiation Safety Program files for future reference to those