

November 25, 1996

Mr. Matthew Kosmider
Plant Manager
AlliedSignal, Inc.
Post Office Box 430
Metropolis, IL 62690

SUBJECT: NOTICE OF VIOLATION DATED OCTOBER 10, 1996

Dear Mr. Kosmider:

This acknowledges receipt of your letter dated November 5, 1996, in response to our letter dated October 10, 1996, transmitting a Notice of Violation with Inspection Report No. 040-03392/96004(DNMS). We have reviewed your corrective actions for Violation No. 96004-01 and they appear to be adequate. The corrective actions that you have implemented for this violation will be examined during a future inspection.

With respect to Violation No. 96004-02 which you contested in your letter, we have reviewed your reason for contesting the violation and have determined that a violation did occur as identified in the subject inspection report for the following reason:

You state in your letter that the controlling procedure for purging the uranium hexafluoride (UF₆) vaporizer and flush pot contained all the information necessary to perform this task safely. The letter notes, however, that the procedure was revised to require a minimum acceptable pressure of 90. PSIG. The NRC disagrees with your contention because the procedure, as written, did not contain an acceptable pressure for the nitrogen header prior to purging. In fact the note at the end of the procedure stated, "Nitrogen pressure may fluctuate and may be lower than the vaporizer pressure." By not providing an acceptable nitrogen pressure in the procedure, the operator could check the pressure in the vaporizer and nitrogen header; ensure that the latter was greater; and then, due to a demand on the nitrogen system, the nitrogen pressure could fluctuate below the vaporizer pressure during purging and cause uranium hexafluoride to enter the nitrogen header because of the back pressure. The procedure did not provide enough detail for an operator to make a determination that the nitrogen header pressure was adequate to ensure UF₆ would not enter the header.

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In addition, we note that during your staff's investigation of the incident, a procedure for the high boiler was reviewed for acceptability after the inspector questioned if the potential existed for a similar problem with other operations. The review concluded that it did not. However, the review appeared to be narrowly focused on nitrogen pressure and did not address the generic issue of providing stepwise instructions in procedures which would allow operators to conduct an evolution using a logical progression through the procedure.

Since corrective actions were taken to address Violation No. 96004-02 by modifying the subject procedure and by reviewing the high boiler procedure, we have no further questions regarding this issue at this time. Your corrective actions will be reviewed during a future inspection.

We will gladly discuss any questions you have concerning this letter.

Sincerely,

Original Signed by R. Caniano for

Cynthia D. Pederson, Director
Division of Nuclear Material Safety

cc: T. Ortziger, Illinois Department of
Nuclear Safety
M. Weber, NMSS
M. Lamastra, NMSS
P. Ting, NMSS
E. McAlpine, RII
C. Cain, RIV
F. Wenslawski, RIV/WCFO

bcc: PUBLIC (IE07)

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DATE	11/21/96		11/21/96		11/22/96			

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AlliedSignal Inc.
Nuclear/Fluorine Specialties
Route 45 North
P.O. Box 430
Metropolis, IL 62960 USA

618 524 2111
618 524 6239 Fax

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:

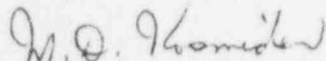
The licensee respectfully contests this violation. The procedure for flushing the vaporizer which was included in the Distillation Manual prior to the September 9, 1996 UF₆ release, contained all of the information necessary to perform this task safely. During questioning by the NRC inspector, the operator 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
Attention: Mr. Philip Ting, Chief Operations Branch
Division of Fuel Cycle Safety & Safeguards, NMSS
Washington, DC 20555

Mr. Gary L. Shear
U.S. Nuclear Regulatory Commission, Region III
801 Warrenville Road
Lisle, IL 60532-4351