

Hind

AUG 11 1978

Docket No. 50-264

Dow Chemical Company
ATTN: Dr. R. R. Langner
Radiation Safety Committee
1803 Building
Midland, MI 48640

Gentlemen:

We have reviewed your response dated July 27, 1978, to the Notice of Violation which was sent to you on July 12, 1978, and we have no further questions concerning these matters at this time.

We plan to continue to conduct unannounced inspections to ascertain whether corrective measures are implemented in accordance with your commitments made to the Commission and to determine whether activities are performed in compliance with the NRC requirements.

Sincerely,

J. A. Hind, Chief
Safeguards Branch

cc: James H. Hanes
Vice President and
General Counsel

cc w/ltr dtd 7/27/78:
Central Files
Reproduction Unit NRC 20b

cc w/ltr dtd 7/27/78 w/o
attachment (Part 2.790(d)):
PDR

8508280051 850712
PDR FOIA
KOHNB5-256 PDR

OFFICE	RII	RII	RII		
SURNAME	Donahue/dal	Hind	Brown		
DATE	8/10/78				

H19

AUG 15 1978

Docket No. 50-264

Dow Chemical U.S.A.
ATTN: Dr. R. R. Langner
Radiation Safety
Committee
1803 Building
Midland, MI 48640

Gentlemen:

This refers to the inspection conducted by Mr. C. H. Brown of this office on July 25-27, 1978, of activities at the Dow TRIGA Reactor authorized by NRC Operating License No. R-108 and to the discussion of our findings with Mr. G. Kochanny and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

No items of noncompliance with NRC requirements were identified during the course of this inspection.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room, except as follows. If this report contains information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty days of your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

780920008

H20

OFFICE ►

SURNAME ►

DATE ►

Dow Chemical U.S.A.

- 2 -

AUG 15 1978

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

Sincerely,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

Enclosure: IE Inspection
Report No. 50-264/78-03

cc w/encl:
Dr. O. V. Anders, Reactor
Supervisor
Central Files
Reproduction Unit NRC 20b
PDR
NSIC
TIC

OFFICE	RIII	RIII	RIII			
SURNAME	Brown/bk	Little	Fiorelli			
DATE	8/14/78					

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-264/78-03

License No. R-108

Docket No. 50-264

Licensee: Dow Chemical
Midland, MI

Facility Name: Dow TRIGA Research Reactor Facility

Inspection at: Dow TRIGA Research Reactor Facility

Inspection Conducted: July 25-27, 1978

Inspector: C. Brown

Approved By: W. S. Little, Chief
Nuclear Support Section 2

8/14/78
8/14/78

Inspection Summary

Inspection on July 25-27, 1978 (Report No. 50-264/78-03)

Areas Inspected: Routine, unannounced inspection was performed on logs and records, audits, requalification training, procedures, surveillance, experiments, and observation of reactor operations. The inspection involved 17 inspector-hours onsite by one NRC inspector.

Results: No items of noncompliance or deviations were identified.

~~7809200009~~

DETAILS

1. Persons Contacted

*O. V. Anders, Reactor Supervisor
*G. L. Kochanny, Manager, Building 1602
T. J. Quinn, Reactor Operator

*Denotes licensees attending the management interview.

2. Logs, Records and Organization

A review was performed to verify that the facility logs and records were maintained consistently with regulatory requirements and that the organization complied with the outline in the Technical Specifications.

The organization was found to be consistent with the requirements and no major personnel changes had occurred. The control room manning was observed to meet the requirements. The log and record review indicated that no significant problems had occurred during the period under review. The required records were available. Specific comments are contained in the applicable sections. No items of noncompliance or deviations were identified in this area.

3. Audits and Review

The audit and review functions of the facility's staff and the Reactor^{*} Operating Committee (ROC) were reviewed to verify the conformance with the Technical Specification requirements. The minutes of the Radiation Safety Committee (RSC) were also reviewed. The review of the records indicated that the audit and review functions were being performed within the Technical Specifications and procedural requirements. The licensee agreed to review the updating of the procedures so that the latest procedure could be verified in use by the operators and the audit teams more efficiently. The revisions and amendments (three changes) were noted to be kept with the Technical Specifications, but the changes were not noted in applicable sections and the licensee agreed to evaluate this item also. These items were discussed in the management interview.

No items of noncompliance or deviations were identified in this area.

4. Requalification Training

The requalification training records were reviewed to verify that the requalification training was conducted as required. The records were found maintained as required for the examination and individual's tests including the documentation for the required reactor operations evaluation. The records contained lecture attendance and lecture guides. The lecture guides contained review of all the facility procedures. The changes in the facility and procedures review, if any, had been implemented into the training program. Sufficient time appears to be provided in the areas covered by the program. The licensee is reviewing a minor item to verify correctness. No items of noncompliance or deviations were identified in this area.

5. Procedures

The facility procedures were reviewed to verify that adequate control was provided for safety-related operations and that effective procedural control had been implemented. The responsibilities of the operators are clearly established. The startup, shutdown, surveillance, and maintenance (maintenance procedures, in general, are the ones supplied by the reactor vendor) appear technically adequate and meet the Technical Specification requirements. The startup and shutdown of the reactor were observed and the procedures appeared adequate. No items of noncompliance or deviations were identified in this area.

6. Surveillance

A review was made of the surveillance records and procedures to ascertain the adequacy of the program and verify that it was conducted within the requirements. The surveillance procedure appears to be technically adequate for verification of the required Technical Specifications items and was up-to-date. The surveillance records indicated all the surveillance items had been performed for the inspection period. The licensee's review of this area appeared to be satisfactory. No items of noncompliance or deviations were identified in this area.

7. Experiments

The experimental records were reviewed to verify that the experiments were conducted in accordance with the **stated requirements**. The records indicated all experiments and irradiations were performed under approved conditions. No new experiments were approved during the inspection period. The number of runs and the number of irradiations had increased slightly. The sample of records reviewed were all for the same type sample of irradiations. (Approval Number 22). The other approvals and reviews were performed. No items of noncompliance or deviations were identified in this area.

8. Management Interview

A management interview was held with the licensee (as denoted in paragraph 1) at the conclusion of the inspection. The following items were included in the discussion:

- a. The licensee agreed to consider noting revisions in the affected Technical Specification sections, supplementing maintaining the changes as additional sections of the Technical Specification volume (paragraph 3).
- b. The licensee is considering dating all procedures with the approval date (paragraph 3).
- c. The licensee agreed to review a minor item in the requalification program for correctness (paragraph 4).