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November 22, 1985

United States Nuclear Regulatory Commission
Region I
Attn.: Mr. Thomas J. Martin
631 Park Avenue
King of Prussia, Pennsylvania 19406

Re: Inspections 50-54/85-04
70-687/85-07

Dear Mr. Martin:

This is in response to your letter of October 1985 regarding results of an NRC inspection on August 19-23, 1985. Listed below are actions taken on the apparent violations which were listed in Appendix A of the report.

- A. "Contrary to... [10 CFR 20.203(c)], on or about August 19 and 20, 1985, two high radiation areas in the pump room and at the I-125 loop glovebox were not posted as required, and, in the absence of the specified control devices, access to the high radiation area by two drums of radioactive waste on the upper level of the reactor building was not locked or attended to prevent unauthorized entry."

In response to these concerns we have removed the two waste drums, which had been on the upper level of the reactor building, to the waste storage building. The area in which these drums are now located is kept locked and is appropriately posted.

The two areas mentioned in your report (pump room and I-125 loop glovebox) are now, as have always been, kept locked when high radiation levels are present. The areas are accessible only to Reactor Operators and Health Physics personnel, all of whom are cognizant of the variable radiation levels in these areas.

The radiation fields from the I-125 loop glovebox are variable due to the cycle of returning Xenon-125 to the box from the reactor. Regardless, we have placed a Caution High Radiation Area sign with a note explaining that dose rates may reach several hundred millirem per hour. We do not intend to remove the sign when dose rates are below 100 mR/hr. even though rates below this cutoff criteria represent the usual situation.

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At the time of the formal monthly August 1985 survey of the pump room, the cation and anion resin columns had recently been replaced. The radiation from these areas did not constitute a High Radiation Area at that time. Appropriately, the Health Physics Technician removed the High Radiation postings. The NRC Inspector subsequently discovered levels above the 100 mR/hr point before the next monthly survey. This is the reason for the discrepancy.

We have reconsidered the advisability of removing the High Radiation Area posting in the resin column area since some portions of the area read above 100 mR/hr the majority of the time. Consequently, we are permanently installing a Caution High Radiation Area sign at the resin columns. The current monthly survey sheet will record the actual dose rate.

- B. "Contrary to... [Technical Specifications Section 4.4(2) and 1.0], during the period from the inception of the current Technical Specifications (July 1984) to August 23, 1985, the stack monitor did not receive monthly channel tests as required."

In order to more formalize the channel test requirement of the technical specifications, we are instituting a radiation source check of instrument response for each of the three stack monitor channels on a monthly basis.

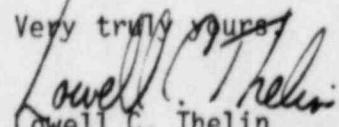
Although we have always felt that the daily review and written record of instrument response to effluent radioactivity more than adequately fulfilled the requirement of a monthly check, we will add the formal check described above to our program effective immediately.

- C. "Contrary to... [10 CFR 20.203(f)], on August 19, 1985, two radioactive rod armatures on a bench top in the machine shop and a 55 gallon drum containing radioactive material on the upper floor of the hot lab facility were not labeled as required."

In reference to the above, we have reinstructed Reactor Operators not to leave radioactive material unattended without labeling. A memo to all Reactor Operators has been issued explaining this concern.

In order to prevent a recurrence of a labeling violation of the type involving the 55 drum, we have reinstructed our Health Physics Technicians to ensure proper labeling of waste containers at the completion of hot cell work and other nonroutine jobs.

Should you desire further information on these response items, please contact me.

Very truly yours,

Lowell C. Thelin
Radiation Safety Officer

cc.: C. J. Konnerth
J. J. McGovern
W. R. Ruzicka