

ENVIROCARE OF UTAH, INC.
THE SAFE ALTERNATIVE

April 24, 1997

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Re: Reply to Notice of Violation dated March 25, 1997, Docket: 40:8989/96-201; SMC-1559

The first of the referenced Notice of Violations states: "Specifically, the operating procedure was not revised to incorporate restrictions on placement of high-activity waste materials near the top or sides of the disposal pile."

1. Reason for Violation: The requirement restricting activity in the upper ten feet of the cell was considered so basic that no procedure was required.
2. Corrective Steps taken and the results achieved: Procedure on disposal has been revised to include higher activity material placement within the upper ten feet of the cell.
3. Corrective Steps to be taken to avoid further violations: All changes to the license and application, including License Conditions 9.3 and 9.4 and License Amendments, will be reviewed by the Quality Assurance Officer to determine applicability to existing procedures or the development of new procedures.
4. Date when full compliance will be achieved: Envirocare is in full compliance.

The second of the referenced Notice of Violations states: "... in part, the licensee made changes to the Quality Assurance Manual, which was part of the license application, without any review by the Safety and Environmental Review Panel as required by License Condition 9.4.(a)(2). In addition, the licensee revised and implemented changes to the General Training Requirements procedure (submitted to the NRC by letter dated January 14, 1994) without prior approval by the NRC as stipulated by License Condition 9.3 or by the SERP as required by License Condition 9.4(a)."

1. Reason for violation: The Quality Assurance Manual and procedure TRAIN-1 were inadvertently submitted to NRC for inclusion into the License Application. Procedure TRAIN-1 was attached to show the training for the Envirocare ALARA program. The Quality Assurance Manual was attached only for reference to addition of the Quality Assurance Officer and Director of Operations positions to the Envirocare organization. The documents are considered by Envirocare to be internal documents and not needing NRC approval.

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ENVIROCARE

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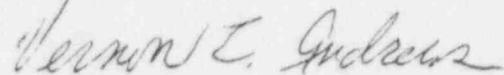
April 22, 1997

U.S. Nuclear Regulatory Commission

2. Corrective Steps taken and the results achieved: The two documents have been submitted to and approved by the SERP.
3. Corrective Steps to be taken to avoid further violations: A License Amendment will be submitted to NRC requesting removal of the two documents from the License Application. All changes to these two documents will be approved by the SERP until the License Amendment is approved.
4. Date when full compliance will be achieved: Envirocare is in full compliance.

Please contact me if you have questions.

Sincerely,



Vernon E. Andrews
Corporate RSO

cc: Regional Administrator, Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Joseph Holonich, Chief, NRC
William Sinclair, Utah DRC
Loren Morten, Utah DRC
File