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**Babcock & Wilcox**

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December 3, 1985

U. S. Nuclear Regulatory Commission  
101 Marietta Street, NW  
Suite 2900  
Atlanta, GA 30323

Attention: Mr. J. P. Stohr, Director  
Division of Radiation Safety and Safeguards

Gentlemen:

REFERENCE: Report No. 70-824/85-07

This is in response to the notice of violation that was forwarded with the referenced report.

1.1 Admission or Denial of the Alleged Violation

I admit to the violation.

1.2 Reasons for the Violation

The air-flow provided to the supplied-air hoods was measured with a calibrated air-flow measuring device to assure that the hoods were provided with at least the minimum flow to permit the use of a protection factor of 1000 as provided for in 10 CFR 20, Appendix A, Footnote h. The LRC was not aware that the measurement was required under the regulations to be made continuously.

1.3 Corrective Steps Which Have Been Taken and the Results Achieved

Upon notification by the inspector that Footnote h was not being adequately complied with, the LRC suspended further use of the system until the air-line pressure gauges could be calibrated. The gauges were calibrated and the system was returned to service.

1.4 Corrective Steps Which Will be Taken to Avoid Further Violations

The air-line pressure gauges are scheduled for annual recalibration.

1.5 The Date When Full Compliance Will be Achieved

The LRC is now in full compliance with 10 CFR 20, Appendix A, Footnote h.

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2.1 Admission or Denial of the Alleged Violation

I admit to the violation.

2.2 Reasons for the Violation

The Cask Handling Area, the room in which the high radiation area is located, is locked and accessible only to authorized personnel or those escorted by authorized personnel. The authorized personnel are approved by the Hot Cell Supervisor and Health Physics and are familiar with the hazards and procedures in the area. The authorized individual responsible for leaning the ladder against the wall of the hot cell did so to gain access to the top of a large shipping cask and had no intention of entering the high radiation area which was located on the roof of the cell.

2.3 Corrective Steps Which Have Been Taken and the Results Achieved

The ladder has been removed.

2.4 Corrective Steps Which Will be Taken to Avoid Further Violations

Ladders which must be leaned against the wall of the hot cell, which could provide access to the high radiation area, will be provided with a ladder guard.

2.5 The Date When Full Compliance Will be Achieved

The LRC is now in full compliance with 10 CFR 20.203(c)(2).

3.1 Admission or Denial of the Alleged Violation

I admit to the violation.

3.2 Reasons for the Violation

Exposure estimates made prior to hot cell entries were based on gamma or beta+gamma measurements and past experience. Records of personnel exposures received during hot cell entries show that the estimates have been conservative; i.e., exposures were lower than the estimates. For this reason, it was felt that direct beta measurements were not required to demonstrate compliance with 10 CFR 20.

3.3 Corrective Steps Taken and the Results Achieved

The measurement of beta activity in the hot cell has been made. This data indicates that previous estimates were conservative and that personnel exposures would have remained below the limits specified in 10 CFR 20 had the earlier assumptions been used in estimating these exposures.

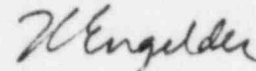
3.4 Corrective Steps That Will be Taken to Avoid Further Violation

The measurement of beta activity will be required prior to or during future hot cell entries.

3.5 The Date When Full Compliance Will be Achieved

The LRC is in full compliance with 10 CFR 20.201(b).

Very truly yours,  
BABCOCK & WILCOX



T. C. Engelder, Director  
Lynchburg Research Center

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