

ATTACHMENT TO LETTER

C. E. BOWERS TO GEORGE H. SMITH

Dated October 16, 1978

USNRC INSPECTION 70-820/78-21

ITEM A.1

USNRC COMMENT

On September 13, 1978, supervision did not assure themselves that suitable control measures were prescribed for the proper precautions to be taken when using contaminated gloves in that procedures have not been established to prevent the spread of contamination in the process area. Contaminated gloves were observed being removed from process equipment without regard to contamination control practices.

UNC RESPONSE

UNC-FRO feels that adequate control measures have been prescribed for prevention of the spread of contamination in the process area. The nature of the operations performed in this plant is such that it is impractical to preclude the occasional dripping of contaminated materials from gloves onto the process area floor. In recognition of that fact, procedures are in place to control the spread of contamination through such activities as spill cleanups, Health Physics monitoring, and periodic cleaning. (Reference SOP I-F, "Health Physics", and SOP I-H, "Contamination Control".)

Unfortunately, UNC failed to comply with these requirements in the specific case outlined by the inspector, in that the operator apparently did not perform all of the cleanup operations of his area at the end of the shift. UNC has reemphasized, to all Operations personnel, the necessity for complying with these requirements in order to control the potential spread of contamination.

ITEM A.2

USNRC COMMENT

Between January 1, 1978, and June 29, 1978, supervision did not assure themselves that procedures relative to radiological safety were followed, in that 37 of 41 transporting vehicles bringing SNM into the facility were not cleared by NIS before leaving the site and 38 of 45 transporting vehicles carrying SNM from the facility, were not monitored for radiation and contamination levels by the NIS Department or their authorized representative.

UNC RESPONSE

Although all containers, incoming and outgoing, were surveyed before the release of any transporting vehicle, the vehicles themselves were not specifically surveyed in all cases. Personnel have been instructed to assure vehicle survey and an appropriate change has been made in the survey document to specifically require vehicle surveys.

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ITEM B  
USNRC COMMENT

On September 15, 1978, appropriate procedures had not been adopted, approved, and implemented pursuant to the regulations in 10CFR 21.21. It was noted that the appropriate draft procedures were available for use by the licensee.

UNC RESPONSE

The draft procedures, which all FRO Managers were aware of and would have used, if needed, have now been formally approved and implemented.

ITEM C  
USNRC COMMENT

On September 13, 1978, signs listing approved nuclear criticality safety limits were not posted so that information is readily discernible to employees on the muffle box storage rack, the 1-L-3B hood and the 4-L-2A hood. In addition, two empty muffle boxes used for SNM were not identified or marked as being empty.

UNC RESPONSE

The referenced signs had become detached from their respective pieces of equipment at the time of the inspection. They have now been replaced. As the operators in the shop are all familiar with these criticality limits, there was no danger of exceeding the safe quantities. UNC has increased the frequency of checks for missing or damaged signs and is improving the sign construction, attachment techniques, and/or placement, where appropriate, to help preclude damage or detachment.

As indicated in the inspection report, the empty muffle boxes were promptly identified as such when the oversight was noted. Operations personnel have been reinstructed as to the requirement for identification of empty SNM containers.



FUEL RECOVERY OPERATION/WOOD RIVER JUNCTION, R. I. 02894

TELEPHONE 401-364-7701

November 20, 1978

CEB 78-224

United States Nuclear Regulatory Commission  
Mr. George H. Smith, Chief  
Fuel Facility and Materials Safety Branch  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Gentlemen:

Subject: USNRC Inspection 70-820/78-21

Reference: Letter on Subject, C. E. Bowers to George H. Smith  
dated November 1, 1978 (CEB 78-216)

The following additional information is provided to supplement  
the referenced letter which was UNC-FRO's response to the  
subject inspection:

ITEM A.1

In order to provide additional assurance against potential spread  
of contamination, UNC will modify specific SOP's dealing with  
Contamination Control and/or Health Physics to include handling  
procedures for contaminated gloves. This action will be  
completed by December 31, 1978.

We trust that this action will satisfactorily resolve this item.

Very truly yours,  
UNITED NUCLEAR CORPORATION

C. E. Bowers  
General Manager  
Fuel Recovery Operation

CEB:RJG:cag