

TEXTRON Lycoming

Stratford Division
Textron Lycoming/
Subsidiary of Textron Inc.

550 Main Street
Stratford, CT 06497
203/385-2000

May 28, 1991

Mr. John Kinneman, Chief
Nuclear Materials Safety Section B
Div. of Rad. Safety and Safeguards.
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA. 19406

RE: Docket No. 040-02917
License No. STB-393
Inspection No. 040-02917/91-001

Dear Mr. Kinneman:

In response to your letter of 4/30/91 and the accompanying Notice of Violation, Textron Lycoming offers the following response for each of the three (3) items listed in the Notice of Violation (NOV):

Item A:

1. Corrective Steps Which Have Been Taken and Results Achieved:

The Radiation Safety Officer has met with the area supervisor and each supervisor of the area where the Kearney Turret Lathe operates and reviewed the operational procedures in place to ensure compliance with condition #13 of our License No. STB-393. The procedure has been clarified with each of these supervisors to include the understanding that chips, turnings, and other magnesium fines must be removed from machines and other places where they collect at the end of each day's work. The machines are now being cleaned regularly and the area swept free of accumulations at the end of each operating shift.

2. Corrective Steps Which Will Be Taken:

The immediate supervisor will inspect the area of operation at the end of each shift and the Radiation Safety Officer will perform spot check/inspections at a frequency he/she determines is necessary to ensure continued compliance with the requirements of the License.

Item A (Cont'd)

3. Date Full compliance Will be Achieved:

The operation is currently in full compliance with the above requirements.

Item B:

1. Corrective Steps Which Have Been Taken and Results Achieved:

The storage yard area for drums of Magnesium-Thorium castings and pieces of castings has been posted as required with placards in which the wording is:

RADIOACTIVE MATERIAL
AUTHORIZED PERSONNEL ONLY

In addition, the area where the chips and turnings are cleaned and packaged, (Building #13) has been posted as required with placards in which the wording is:

CAUTION
RADIOACTIVE MATERIAL

2. Corrective Steps Which Will Be Taken:

These postings will be reviewed as part of scheduled inspections by the Environmental Services Department.

3. Date Full Compliance Will Be Achieved:

These actions were in place April 1, 1991.

Item C:

1. Corrective Steps Which Have Been Taken and Results Achieved:

Each package of radioactive material labeled with a RADIOACTIVE YELLOW-II marking, have been properly designated for transportation index marker as well as the Hazardous Material Identification Number, UN 2912.

2. Corrective Steps Which Will Be Taken:

Scheduled monthly inspections will be used to ensure these labels are complete with the TI, and before each shipment is made.

Item C (Cont'd)

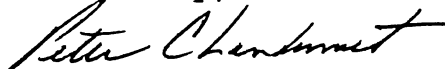
3. Date Full Compliance Will Be Achieved:

This was completed on April 1, 1991 and verified on the next shipment, May 20, 1991.

In reference to the concern raised on Page 1, paragraph 3 of your letter, a new dust collection process has been engineered to further improve the situation. A purchase (work) order has been approved to purchase the collection system. We anticipate the installation of the system to be complete by 9/30/91, assuming there is no work interruption due to a contract dispute (currently under negotiation).

Textron Lycoming is committed to programs, practices, and procedures to assure compliance with all laws and regulations dealing with health, safety, and the environment. To reinforce this commitment, I have recently issued a memo (see enclosed) to all Supervision reminding each that the Environmental Services Department has the authority to issue an order to shut down, curtail, or otherwise restrict operations which pose a threat to the environment, or could result in violations of environmental laws and regulations. This authority is extended to those issues dealing with the Nuclear Regulatory Commission activity as monitored by our Radiation Safety Officer who is a member of our Environmental Services Department.

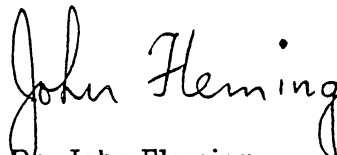
Sincerely,



P. Chandonnet
Vice President, Operations

cc: J. Fleming

JF/fc
RFK528



Dr. John Fleming
Radiation Safety Officer