



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

APR 30 1991

Docket No. 040-02917

License No. STB-393

AVCO Lycoming Textron
ATTN: Peter Chandonnet
Vice President of Operations
550 South Main Street
Stratford, Connecticut 06497

Gentlemen:

Subject: Routine Inspection No. 040-02917/91-001

On March 27 and 28, 1991, C. T. Oberg of this office conducted a routine safety inspection at the above address of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. In addition, our inspection examined the activities covered in your correspondence dated November 25, 1987. The findings of the inspection were discussed with John S. Fleming, Ph.D., RSO at the conclusion of the inspection.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed as Appendix A and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

In addition to our concern for corrective action with respect to the specific violations identified in Appendix A, we are concerned with regard to dust generated during the new Mg-Th chip and turnings cleaning process in the Mg-Th Scrap Processing Building. During this cleaning process, the inspector observed that dust was generated and released within the building. At only the final step in the process is there a Torit dust/particle collector installed to retain the Mg-Th fines. With the exception of the movement of air through open doors in the building from strong wind gusts, there is no ventilation provided to exhaust or collect the dust generated. During the inspection your staff explained that they were aware of this situation and were attempting to resolve it. In your reply to this letter, please discuss actions taken or planned to eliminate and/or control the dust generated and released during the Mg-Th chip cleaning process.

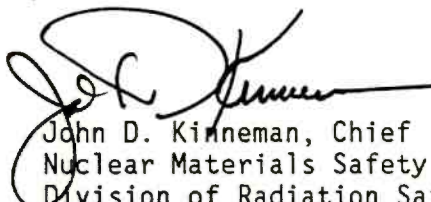
Item A in the Notice of Violation enclosed with this letter was identified during a previous inspection of your licensed activities and documented in a Notice of Violation enclosed with our letter dated October 23, 1987. From this inspection, it appears that your corrective actions were not effective since this item has recurred. Recurrent and uncorrected violations are given additional weight in the consideration and selection of appropriate enforcement action. Therefore, in your response to this letter, you should give particular attention to those actions taken or planned to ensure that identified items of noncompliance will be completely corrected and will not recur.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us is appreciated.

Sincerely,



John D. Kinneman, Chief
Nuclear Materials Safety Section B
Division of Radiation Safety
and Safeguards

Enclosures:

1. Appendix A, Notice of Violation
2. Copy of Licensee's letter dated February 4, 1985

cc:

Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
State of Connecticut
John S. Fleming, Ph.D., Radiation Safety Officer

APPENDIX A

NOTICE OF VIOLATION

AVCO Lycoming Textron
Stratford, Connecticut 06497

Docket No. 040-02917
License No. STB-393

As a result of the inspection conducted on March 27 and 28, 1991, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1990), the following violations were identified:

- A. Condition 13 of License No. STB-393 requires that licensed material be possessed and used in accordance with the statements, representations and procedures contained in an application dated March 24, 1983.

Section III.C. in Standard Procedure No. 3247 of Attachment 10.C. to the application requires Oilers/Chippers to remove turnings prior to and after the machining of magnesium parts. Further, Paragraph 421 of the attachment dated January 18, 1983, to the application, Magnesium-Machining and Handling; Reference, National Fire Protection Association, Code #48, Storage, Handling, and Processing of Magnesium (NFPA Code #48) requires that chips, turnings, and other magnesium fines be removed from machines and other places where they collect at the end of each days work.

Contrary to the above, on March 28, 1991, the inspector observed a Karney Turret Lathe covered with Mg-Th chips and turnings. During discussions with the area supervisor, the inspector was informed that the lathe has remained in this condition since its last use two days before.

This is a Severity Level IV violation. (Supplement VI)

- B. 10 CFR 20.203(e) requires that area or rooms in which specified amounts of licensed material are used or stored be conspicuously posted "Caution, Radioactive Material."

Contrary to the above, on March 28, 1991, the inspector observed that the fence around the waste storage yard containing 55 gallon drums of Mg-Th chips and turnings, and packaged Mg-Th castings and pieces of castings, was not posted, as required. In addition, the building in which Mg-Th chips and turnings were subjected to the new cleaning and packaging process was not posted, as required.

This is a Severity Level V violation. (Supplement IV)

- C. 10 CFR 71.5(a)(1(ii)) requires that licensees who transport licensed material outside the confines of their plants or deliver licensed material to a carrier for transport comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 172 and 173.

49 CFR 172.403 requires that each package of radioactive material, unless excepted from labeling by §173.421 or §173.422, be labeled, as appropriate, with a RADIOACTIVE WHITE-I, a RADIOACTIVE YELLOW-II, or a RADIOACTIVE YELLOW-II label. The proper label to affix to a package of radioactive material is based on the radiation level at the surface of the package and the transport index (TI), (173.403).

Contrary to the above, on March 27, 1991, the inspector observed several 55 gallon drums containing scrap Mg-Th waiting to be shipped. The packages were properly labeled with RADIOACTIVE YELLOW-II, labels but these labels did not include the correct TI value. The Hazardous Material Identification Number, NU 2912, was written in the space designated for the TI and no TI value was included.

This is a Severity Level V violation. (Supplement V)

Pursuant to the provisions of 10 CFR 2.201, AVCO Lycoming Textron is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.