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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

KEITH W. AMISH
EXECUTIVE VICE PRESIDENTTELEPHONE
AREA CODE 716 546-2700

March 4, 1980

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

Subject: IE Inspection No. 50-244/79-18
R. E. Ginna Nuclear Power Plant, Unit #1
Docket No. 50-244

Dear Mr. Smith:

This letter is in response to your February 7, 1980 letter received February 13, 1980 concerning the inspection conducted at Ginna Station December 3-6, 1979 by Mr. Markowski and Mr. Yuhas of your office. Your letter listed five activities as not being conducted in full compliance with USNRC requirements. The following information will respond to those items for which you require a response.

ITEM A

"10 CFR 71.3, 'Requirement for license,' requires that no licensee subject to the regulations in this part shall (a) deliver any licensed materials to a carrier for transport or (b) transport licensed material except as authorized in a general license or specific license issued by the Commission, or as exempted in this part.

Contrary to the above, on June 26, 1978, February 1, 1979, and May 29, 1979, the licensee delivered; 262 Ci, 86 Ci, and 19.88 Ci respectively, of licensed material to a carrier for transport without authorization in a general or a specific license and no exemption to 10 CFR 71 was applicable."

RESPONSE

We were in compliance with licensing requirements except that, as stated in the details of the inspection report, the infractions involved not having on hand a reference drawing referred to in the Certificate of Compliance, one of four drawings utilized by the vendor for cask construc-

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tion for the first two shipments. For the third shipment involving the CNSI-6144 cask a Certificate of Compliance reference supplement was not available. The drawing was received during the inspection. A copy of the reference supplement has been requested from Chem-Nuclear, and verbal notification of its transmittal has been received.

Detailed maintenance procedure M-18.6 was issued on January 31, 1980 to provide tighter control of handling, loading and unloading of the CNS-8-120 (formerly LL-50-100) cask. In addition, Quality Control Inspection Procedure QCIP-21 has been revised to include checking USNRC Certificates of Compliance for proper references and their currency prior to receipt of the cask at Ginna Station.

Future use of the Model CNSI-6144 cask is not anticipated; however, in the event that this cask is to be used in the future, the procedures governing handling, unloading and inspections of the cask and related documentation will be written prior to use to a format similar to those for the CNS-8-120 cask discussed above.

ITEM B

"10 CFR 71.5, 'Transportation of licensed material,' requires that no licensee deliver any licensed material to a carrier for transport, unless the licensee complies with the applicable requirements of the Department of Transportation regulations 49 CFR Parts 170-189.

Contrary to the above, on February 1, 1979, the licensee delivered 86 Ci of licensed material to a carrier for transport without identifying the presence of 58 millicuries of Strontium 90 as required by regulation 49 CFR Part 172.203(d). "

RESPONSE

The omission of the 58 millicuries of strontium 90 from the radioactive shipment papers was a clerical error in transferring data. Since this shipment the likelihood of not including determined isotopes has been significantly reduced as it has become a practice of the burial grounds to require an isotopic analysis of the material being shipped. Furthermore, procedure RD-10 Shipping Radioactive Material is being revised to require the isotopic contents on the radioactive shipment records.

The details of the inspection report discusses two shipments including that cited above. The other instance contained 30 millicuries of strontium 90. Whereas the first instance involved 0.07% of the total Curie content the second involved only 0.01%. This had been purposely



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omitted because of our interpretation of the Department of Transportation regulation 49 CFR 172.203 which states "(d) The description for the shipment of radioactive material must include the following additional entries as appropriate; (i) The name of each radionuclide in the radioactive material that is listed in the table 173.390 of this subchapter." Nearly all fission products listed in the table 173.390 exist in this type of resin shipment, although many are in very small quantities.

ITEM C

"10 CFR 71, Appendix E, 'Quality Assurance Criteria for Shipping Packages of Radioactive Material,' Criterion 5, 'Instructions, Procedures and Drawings' requires that activities affecting quality be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and that these activities be accomplished in accordance with these instructions procedures or drawings.

Contrary to the above, on February 1, 1979 and May 29, 1979 the licensee delivered 86 Ci and 19.88 Ci of licensed material to a carrier for transport in a package which was loaded and closed without written procedures."

RESPONSE

For recent shipments, as described under item A above, procedure M-18.6 has been implemented with specific references to detailed vendor instructions and QCIP-21 revised to provide procedures and documentation for handling, loading and unloading of the CNS-8-120 licensed cask which details all aspects of preparing a shipment consistent with 10 CFR 71 Appendix E requirements.

Future shipments utilizing other containers certified for Type B or greater than type A quantities will be handled similarly. These procedures will meet the requirements of Part 13 of the Q. A. manual.

ITEM D

"10 CFR 71, Appendix E, Criterion 16, states in part: 'Measures shall be established to assure that conditions adverse to quality...are...promptly corrected.' Procedure A-1801, Ginna Station Response to Internal Audits, Revision 0, steps 3.3.1, 3.3.3 and 3.3.5 state in part that individual audit findings are presented on Audit Finding Corrective Action Reports (AFCAR), the response to the audit finding is formulated and includes the proposed corrective action and a Target Completion Date, and the response is submitted to the Audit Team Leader on or before the due date.



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Contrary to the above, AFCAR-1 of Audit Report No. 79-33:CA specified a response due date of November 12, 1979; and, as of December 5, 1979 no response had been formulated."

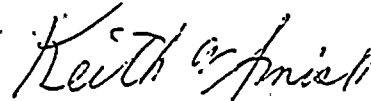
RESPONSE

On December 17, 1979 a response to AFCAR-1 on audit 79-33:CA was submitted and accepted by QA. Management has stressed the importance of timely response to audit findings through staff meetings and personal contacts.

In addition to the corrective action regarding the specific items discussed above, your letter requested actions to improve the effectiveness of management control systems. A member of the plant Health Physics staff has been assigned the responsibility of management of waste shipments. For shipments of greater than Type A quantities the Quality Control group will be involved in package inspection and control. In addition, management is considering assigning responsibility for details involving all waste shipments to an additional technical person.

The inspection report, with the exception of the two pages containing Item E of Appendix A, and paragraph 13B of the inspection report, each stamped "Part 2.790(d) Information," contains no information that is considered proprietary. Pursuant to your letter of February 7, 1980, we understand that those two particular pages will not be placed in the Public Document Room.

Very truly yours,



Keith W. Amish

