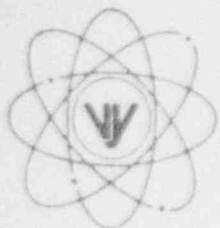


# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO  
ENGINEERING OFFICE  
580 MAIN STREET  
BOLTON, MA 01740  
(508) 779-6711

May 7, 1993  
BVY 93-047

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

References: a) License No. DPR-28 (Docket No. 50-271)  
b) Letter, USNRC to VYNPC, Inspection Report 93-06, dated 4/9/93

Subject: Reply to Notice of Violation - Inspection Report 93-06

Dear Sir:

This letter is written in response to Reference (b), which documents that one of our activities was not conducted in full compliance with NRC requirements. The Violation, classified as a Severity Level IV, was identified during a routine radwaste and transportation inspection conducted on March 9-12, 1993. Our response to this item is provided below.

## VIOLATION:

10 CFR 20.311(d) requires that any generating licensee who transfers radioactive waste to a land disposal facility or a licensed waste collector shall prepare all wastes so that the waste is classified according to 10 CFR 61.55. 10 CFR 61.55(a) states the concentration of radionuclides may be determined by indirect methods such as the use of scaling factors which relate the inferred concentration of one radionuclide to another that is measured...if there is reasonable assurance that the indirect methods can be correlated with actual measurements.

Contrary to the above on October 5, 1992, a shipment of licensed material was sent from Vermont Yankee Nuclear Power Station to the Chem-Nuclear commercial low-level radioactive disposal site in Barnwell, S.C. in which the concentration of the radioactive nuclides in the waste was determined by indirect methods using scaling factors and the licensee did not provide reasonable assurance that the indirect methods correlated with actual measurements. Specifically, the latest available waste stream analysis data was not used to determine the scaling factors. As a result, the waste was incorrectly classified as Class A waste and should have been classified as Class B waste using the licensee's procedure.

This is a Severity Level IV violation.

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U.S. Nuclear Regulatory Commission  
May 7, 1993  
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RESPONSE

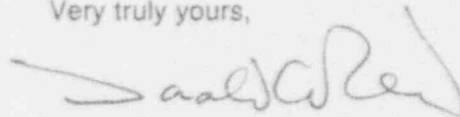
Based on our root cause analysis, this problem occurred due to a lack of management controls for the timely processing and updating of the applicable scaling factors in the computer program used to classify our radioactive waste. This program had recently been improved and formalized into a new procedure in response to an internal Quality Assurance audit, however, specific guidance for implementation of the scaling factors had not been included.

The new scaling factors had been entered into the system prior to the time of the inspection, so no additional changes were needed. Our review of previous shipments determined that no other problems in the classification existed and no further findings were identified. All present radioactive waste shipments are being classified by the updated data.

The controlling procedure, OP 2527, "Sampling and Analysis for Radwaste Classification", has now been revised to include specific guidance for entry of the updated scaling factors into the classification process. Additionally, we have emphasized the need for timely corrective actions and attention to detail with the appropriate Supervisor and his staff.

We trust the information provided is adequate; however, should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



Donald A. Reid  
Vice President, Operations

/dm

cc: USNRC Regional Administrator, Region I  
USNRC Resident Inspector, VYNPS  
USNRC Project Manager, VYNPS