

**BOSTON EDISON COMPANY**  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

February 22, 1982

BECO. Ltr. #82-59

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical  
Inspection  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

License No. DPR-35  
Docket No. 50-293

Response to IE Inspection 81-26

Reference (a): NRC letter of January 22, 1982 from  
Mr. T. T. Martin to Mr. A. V. Morisi  
(BECO Letter #1.82.017)

Dear Sir:

Herein is Boston Edison's response to an item of violation identified in the reference.

Violation

10 CFR 30.41 prohibits transfer of byproduct material unless it is in a form authorized by the recipient's NRC or Agreement State license. South Carolina License No. 097, an Agreement State license issued to Chem-Nuclear Systems, Inc., prohibits the receipt of solidified waste with "detectable free standing liquid" which is defined in the license as liquid in excess of 0.5 percent by waste volume for drums.

Contrary to the above, on July 20, 1981, a waste shipment of byproduct material, containing 0.134 curies of solid metallic oxides on gravel and trash, was transferred to Chem-Nuclear Systems, Inc., at Barnwell, South Carolina with detectable free standing liquid (from 0.8 to 1.34 percent liquid by waste volume) in each of four drums in the shipment.

This is a Severity Level III violation. (Supplement IV.C.6)

Response

Boston Edison concurs that this violation did occur.

We believe, however, that categorizing this as a Level III violation is inappropriate, because neither 10 CFR 20.303, nor 10 CFR 20.304 are applicable. We believe that this violation should be categorized as one of Severity Level IV

(Supplement V.D.1)

8206030200 820527  
PDR ADDCK 05000293  
Q PDR

BOSTON EDISON COMPANY

Mr. Thomas T. Martin, Director  
February 22, 1982  
Page 2

Although the total waste shipment did contain 0.134 curies of radioactive waste, the twelve drums contained a total of 0.00576 curies of radioactive waste, with the remainder of the shipment enclosed in sealed wooden boxes. The analyses of the excessive free standing liquid found in four of the twelve drums was of an exempt nature in accordance with 10 CFR 30.14 and 10 CFR 30.70, and is believed to have been rainwater intrusion.

Our immediate corrective action was to institute increased supervisory observation of waste packaging activities.

A reprimand was given to those individuals involved in this event for their inadequate performance in following existing procedures. In addition, firm verbal reiteration of the requirement for the performance of detailed inspections, to ensure that waste material is free of liquid, was provided to all waste handling supervisors and operators. Full compliance to these management controls was achieved by August 21, 1981.

Procedural revisions to incorporate these specific instructions have been implemented to preclude a recurrence of this type of incident.

We believe this response satisfactorily addresses the violation identified in the reference. Should you require any further information concerning this response, please contact us.

Very truly yours,

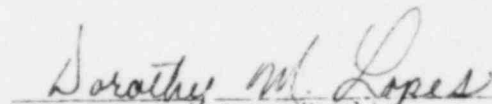


W. H. Deacon  
Acting Manager  
Nuclear Operations Support

Commonwealth of Massachusetts)  
County of Suffolk )

Then personally appeared before me, William H. Deacon, who, being duly sworn, did state that he is Acting Manager - Nuclear Operations Support of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: July 6, 1984

  
Notary Public