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FILE 72

STATE OF ILLINOIS  
**DEPARTMENT OF NUCLEAR SAFETY**

1035 OUTER PARK DRIVE  
SPRINGFIELD 62704  
(217) 785-9900

TERRY R. LASH  
DIRECTOR

January 24, 1990

Mr. Roland Lickus  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Lickus:

On December 14, 1989, representatives of this Department conducted an inspection of the low-level radioactive waste packaging and transport activities at Commonwealth Edison's LaSalle Nuclear Station. This inspection was conducted in accordance with Subagreement I of our Memorandum of Understanding (MOU) dated June 11, 1984.

Our representatives reviewed those elements of LaSalle Station's packaging and transport programs that are outlined in the attached "DRAFT" inspection checklist. At the time of this inspection those aspects of their program reviewed were found to be in compliance with appropriate regulations and license conditions.

The staff at LaSalle Station were very cooperative during our inspection and allowed free access to all necessary records and documents. Should you have any questions regarding this or other IDNS inspections, please contact me at (217) 785-9936.

Sincerely,

*for*   
John W. Cooper, Manager  
Office of Environmental Safety

JWC:aes

Attachment

9007120279 900612  
PDR FOIA  
O'MEAL 190-144 PDR

JAN 26 1990

3/11

# LLRW GENERATOR INSPECTION CHECKLIST

Facility Name: Ceco - LaSalle Nuclear Station

Facility Address: RR#1, Box 220

City: Marseilles, Illinois

Zip Code: 61341

Telephone Number: 815-357-6761

Administrator: G. Diederich

other contact person: Linda Shearer-Radwaste Co-ordinator

IDNS Inspector (s): Tim Runyon

Rick Hand

Mark Martinez

Inspection date: 12 14 89 Date of last inspection: • • •

## Summary of Citations

None

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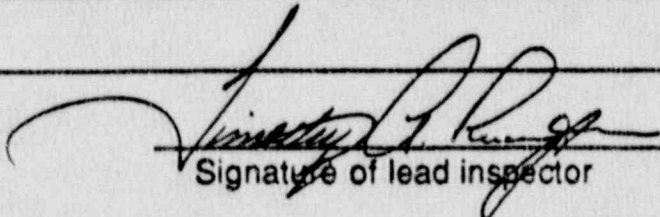
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Signature of lead inspector

**DRAFT**

**DRAFT OUTLINE**

**LLRW GENERAL INSPECTIONS**

**MANAGEMENT CONTROLS AND QUALITY ASSURANCE**

*Nuclear Power Plants  
Lind. Shearer & 57-6761*

**S U DATE**

**A. VERIFY THAT WRITTEN PROCEDURES ARE IN PLACE FOR:**

1. Characterization/Classification/Manifesting of waste including identification of methods and individuals responsible for each process. (10 CFR 20.311, 61.55 and 61.56)

✓		in procedures
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2. Transportation of radioactive waste to a disposal site or waste broker, including identification of individuals responsible for transportation procedures. (Management controls checklist and bulletin 79-19)

✓		
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3. Notification of proper authorities regarding transport of large quantity and HMRCQ shipments of radioactive waste. Procedures should identify the party responsible for making such notifications. (10 CFR 71.97)

N/A		procedures are in place but have not been required for shipment from LaSalle
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**B. ENSURE THAT ADEQUATE TRAINING AND QUALIFICATION PROGRAMS ARE IN PLACE IN ALL OF THE SPECIALIZED AREAS INCLUDING:**

1. Waste characterization/classification

✓		
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2. Packaging and Transportation procedures (Training and qualification checklist and Bulletin 79-19)

✓		
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**C. VERIFY THAT THE LICENSEE IS MAINTAINING APPROPRIATE RECORDS AND CURRENT DOCUMENTS INCLUDING THE FOLLOWING:**

1. Current copies of USNRC and USDOT regulations. (bulletin 79-19)

✓		
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2. Current copies of their burial site licenses. (bulletin 79-19)

✓		
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3. Records showing the amount of radwaste generated, the number of shipments of licensed materials for a period of three years, unless exempted by 10 CFR 71.10, and the amount of material stored on site. (10 CFR 71.91)

✓		
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4. Copies of NRC package certificates and Engineering tests for non certified packages.

✓		
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DRAFT

D. ENSURE THAT QUALITY ASSURANCE PROGRAMS AND APPROPRIATE RECORDS ARE MAINTAINED FOR THE FOLLOWING AREAS:

1. Waste characterization and classification
2. Packaging and package testing
3. Transportation

S	U	DATE
✓		12/14/89
✓		✓
✓		✓

WASTE CHARACTERIZATION AND CLASSIFICATION

- A. VERIFY THAT THE LICENSEE HAS AN ADEQUATE PROGRAM FOR RADIONUCLIDE IDENTIFICATION AND QUANTIFICATION. (10 CFR 61.55 and Branch Technical Papers)
- B. VERIFY THAT THE LICENSEE HAS AN ADEQUATE PROGRAM FOR WASTE CHARACTERIZATION. (10 CFR 61.55 and BTP's)
- C. VERIFY THAT THE LICENSEE HAS AN ADEQUATE PROGRAM FOR WASTE CLASSIFICATION. (10 CFR 61.56 and BTP's)
- D. REVIEW THE PROCEDURES AND ENSURE THAT THE MANIFESTING ARE ADEQUATE. (10 CFR 20.311)
- E. VERIFY THAT A QUALITY ASSURANCE PROGRAM EXISTS THAT ENSURES COMPLIANCE WITH REQUIREMENTS REGARDING ALL OF THE ABOVE.

S	U	DATE
✓		12/14/89
✓		✓
✓		✓
✓		✓
✓		✓

PACKAGING

- A. ENSURE THAT THE APPROPRIATE PACKAGES ARE USED, BASED ON THE FORM, RADIONUCLIDE, ACTIVITY, ETC. VERIFY THAT THE PACKAGES MEET REQUIREMENTS OF THE PARTICULAR DISPOSAL SITE USED BY THE LICENSEE. (49 CFR 173.475)
- B. VERIFY THAT PACKAGES ARE FABRICATED IN ACCORDANCE WITH DOT/NRC APPROVED DESIGN CRITERIA. RESULTS OF ENGINEERING TESTS AND PACKAGE CERTIFICATIONS SHOULD BE MAINTAINED AND AVAILABLE FOR EACH DOT APPROVED PACKAGE USED. (10 CFR 71.12, 49 CFR 173.413, 173.415, 173.416, 173.471, 178.350)

S	U	DATE
✓		✓
✓		✓

~~Certificate of Compliance Expires~~  
in 1993

# DRAFT

C. IFY THAT THE APPROPRIATE DETERMINATIONS ARE MADE PRIOR TO THE INITIAL USE OF EACH PACKAGE (10 CFR 71.85) AND AGAIN PRIOR TO EACH USE OF A PACKAGE (10 CFR 71.87)

D. VERIFY THAT RECORDS EXIST DEMONSTRATING COMPLIANCE WITH USDOT SPEC 7A PACKAGES REQUIREMENTS. (49 CFR 173.415 (a)).

S U DATE

✓		12/14/89
✓		12/14/89

## TRANSPORTATION

### A. SHIPPING PAPERS/WASTE MANIFEST

S U DATE

1. Verify that an adequate program exists for determining A1 and A2 values. (49 CFR 173.435)

2. Verify that the licensee has a program for determining A1 and A2 values not listed in 49 CFR. (49 CFR 173.433)

3. Verify that all waste manifests are completed in accordance with 10 CFR 20.311 and that they also meet 49 CFR shipping paper requirements if used for that purpose.

4. Verify that activity limits are not exceeded for type A and Type B packages. (49 CFR 173.416, 173.431, 173.435)

5. Review shipping records to ensure that advance notifications were given to consignees (10 CFR 71.87 and 49 CFR 173.22 (c)) and states (10 CFR 71.97)

6. Ensure that the licensee has a program for tracking shipments and investigating any lost shipments. (10 CFR 20.311)

✓		Computer based 12/14/89
N/A		
✓		Observed shipment 12/14/89
✓		
✓		
✓		

### B. MARKING

1. Verify that packages are properly marked in accordance with 49 CFR 172.310.

### C. LABELING

1. Verify that packages are properly labelled in accordance with 49 CFR 172.403 and 172.436- 172.438.

2. Verify that waste packages are properly labelled in accordance with 10 CFR 20.311.

✓		observed resin ship ment. 12/14/89
✓		12/14/89
✓		12/14/89
✓		12/14/89

# DRAFT

## D PLACARDING

S U ATE

1. Verify that proper procedures exist for loading and placarding non-exclusive use shipments. (49 CFR 172.506 and 173.466)	✓		12/14/89
2. Verify that proper procedures exist for loading and placarding exclusive use shipments. (49 CFR 172.466 and 173.425 (b) 7)	✓		Placards on shipment 12/14/89
3. Verify that instructions for maintenance of exclusive use accompany shipping papers/waste manifests when appropriate.	✓		12/14/89 Weged in files
<b>E. RADIATION/CONTAMINATION LEVELS</b>			
1. Verify that an adequate program exists for compliance with external radiation levels limitations and determination of Transport Indexes. (49 CFR 172.441, 172.403)	✓		Observed rad sur of Resin shipment 12/14/89
2. Verify that procedures exist to ensure compliance with external radioactive contamination level limits specified in 10 CFR 71.87.	✓		procedures and env in Types files 12/14/89
<b>F. QUALITY CONTROL/QUALITY ASSURANCE</b>			
1. Review the activities of the quality control program for packaging and transportation activities.	✓		12/14/89
2. Interview a sufficient number of personnel from each of the specialized areas to ensure competency.	✓		12/14/89

\* Note: Copies of written procedures were made available to IDNS inspectors but were not received until after the inspection. Review of procedures after the fact, helped clarify unanswered questions from the inspection.

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10-107007-100130

FEB 8, 1990



STATE OF ILLINOIS  
DEPARTMENT OF NUCLEAR SAFETY  
1035 OUTER PARK DRIVE  
SPRINGFIELD, IL 62704  
(217) 785-0000

TERRY R. LASH  
DIRECTOR

February 8, 1990

TO: Harold Denton  
U.S. Nuclear Regulatory Commission

FROM: Terry R. Lash  
IL Department of Nuclear Safety  
(217) 785-9868

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(including transmittal sheet)

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