



**GPU Nuclear Corporation**

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February 24, 1984

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

Dear Mr. Martin:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Inspection Report 83-27

This letter is submitted in response to your letter of January 17, 1984, regarding the Notice of Violation (NOV) contained in Appendix A. On February 17, 1984, an extension of response time to February 24, 1984 was requested via telephone by GPU Nuclear and granted by Mr. Monte Conner of Region I.

In accordance with 10 CFR 2.201, the attachment to this letter represents our reply to the NOV. If there are any questions regarding the information therein, please contact me or Mr. Michael Laggart of my staff at (609)971-4643.

Very truly yours,

Peter B. Fiedler  
Vice President and Director  
Oyster Creek

PBF:PFC:dam  
Attachment

cc: Dr. Thomas E. Murley, Administrator  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

NRC Resident Inspector  
Oyster Creek Nuclear Generating Station  
Forked River, NJ 08731

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ATTACHMENT

Violation:

As a result of an inspection conducted on November 29, 1983 to December 2, 1983, and in accordance with the NRC Enforcement Policy, 10 CFR 2, Appendix C, the following violation was identified:

10 CFR 71.12(a) is a general license issued to any licensee of the Commission to transport licensed material in a package for which a certificate of compliance has been issued by the NRC. 10 CFR 71.12(c) requires a licensee using such a package to have a copy of the certificate of compliance for the package, and the licensee must comply with the terms and conditions of the certificate.

Condition No. 9 of Certificate of Compliance (C of C) No. 6601 for package Model No. CNS 8-120, requires the drain line and access plugs to be appropriately plugged and sealed prior to transport.

Contrary to the above, package Model No. CNS 8-120, Certificate of Compliance No. 6601, was used to transport 42 Curies of licensed material on November 2, 1983, and the drain line and access plugs were not verified to be appropriately plugged and sealed prior to transport.

This a Severity Level V violation (Supplement V).

Reply:

We concur with the violation as stated.

In response to the inspector's concern, package integrity was immediately verified with Chem-Nuclear Services, Inc. (CNSI) at the time of the inspection by telephone conversation. GPU Nuclear subsequently received a letter of confirmation from CNSI stating that the package tack-welded drain plug was in place prior to delivery to Oyster Creek and upon receipt of the shipment at the disposal site. The tack-welded drain plug constitutes a "security seal" or anti-tamper seal" which we understand is not a requirement. CNSI indicates that all CNSI 8-120 casks have security seal provisions on drain plugs or it is tack-welded as was the case with this specific cask.

As an interim measure regarding the drain line plug, all Radwaste Shipping supervisors were informed of the procedural deficiency and instructed to verify drain plug integrity and document same in the comments section contained in Procedure 351.32, Figure 351.32.1, Step 11. A temporary revision to Procedure 351.32, was submitted for review on December 2, 1983. This revision requires inspection of the CNSI Model 8-120 package drain plug and documentation of that inspection on the appropriate form. Final review of the procedure revision was completed on February 19, 1984.

With regard to the access plugs on the package lid, it is our understanding, based upon communications between GPU Nuclear and CNSI and between CNSI and the Transportation Certification Branch of NRC, that security seals are not required for the access plugs. In addition, the access plugs are no longer utilized. They were provided in the package design to accommodate in-cask solidification which is no longer the method used. CNSI has indicated that the access plugs are inserted in conjunction with a sealant. We consider a QA receipt inspection of the package to be sufficient to assure that the access plugs are appropriately plugged and sealed. However, a visual inspection prior to shipment to verify the access plugs are in place will be performed. A procedure revision was submitted on February 24, 1984 to document this visual inspection.

The November 2, 1983 shipment and all subsequent shipments with the CNSI 8-120 packages were in accordance with the package approval.

Full compliance was achieved on November 29, 1983.