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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

December 1, 1983

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

ATTENTION: Mr. Thomas T. Martin, Director
Division of Engineering & Technical Program

Gentlemen:

Results of the routine safety inspection transmitted by Inspection Report 50-317/83-23; 50-318/83-23, identified an item of apparent noncompliance with NRC Regulations. As a result of subsequent investigations by our staff, we feel there are certain facts which were not discussed with the NRC Inspector during the exit interview that provide evidence no violation of Technical Specifications, Section 6.8, occurred on the dates specified in your report. Our conclusion is supported by the fact that adequate written procedures were established and were being followed by workers involved in the collection and transport of liquid radioactive waste generated by our temporary decontamination facility.

Appendix A, section 9.a of Regulatory Guide 1.33 (Revision 2 dated February 1978) recognizes that certain maintenance activities do not require detailed step-by-step delineation in procedures as long as the skills necessary to perform such activities are normal skills possessed by qualified personnel. In our opinion, the skills necessary to physically transport radioactive liquids in most nuclear power plant evolutions at our facility are "normal skills" possessed by the personnel we have designated to perform the activity. Personnel training for such activities meets or exceeds the requirements specified in ANSI N 18.1 (1971). Regarding the transfer and disposal of such wastes, the activity identified in the Inspection Report was conducted under the auspices of other approved administrative procedures. Specifically, the transfer of the radioactively contaminated water was performed under the controls of a Special (Radiation) Work Permit (SWP) and under the guidance of a qualified technician. The waste discharge to the environment was performed under an approved liquid waste permit.

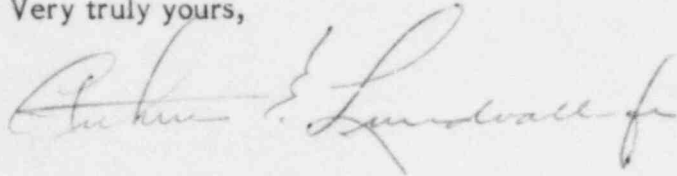
Many of our routine nuclear power plant activities are performed similarly under generic guidance that is implemented through effective supervision, training, and appropriate qualification programs. This operating philosophy is consistent with Regulatory Guidance and provides the most efficient and practical approach to safe nuclear power plant operations.

Based on the additional information provided above, we request that you reconsider the issuance of the subject item of noncompliance.

Mr. T. T. Martin
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Should you have further questions regarding this matter, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Arthur E. Lundvall". The signature is written in dark ink and is positioned to the right of the "Very truly yours," text.

AEL/LOW/gla

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
R. E. Architzel, NRC