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VICE PRESIDENT
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May 30, 1984

Docket Nos. 50-277
50-278

Inspection No. 50-277/84-09
50-278/84-09

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

Dear Mr. Martin:

Your letter of April 30, 1984, forwarded combined Inspection Report 50-277/84-09 and 50-278/84-09. The report cited three apparent violations of NRC requirements. This letter will restate the violations and provide our responses.

- A. 10 CFR 61.57, "Labeling", states "Each package of waste must be clearly labeled to identify whether it is Class A waste, Class B waste, or Class C waste in accordance with paragraph 61.55."

Contrary to the above, on March 5, 1984, and March 6, 1984, the licensee made two shipments of licensed waste material to Barnwell, South Carolina and twenty-three packages containing the waste were improperly classified as Class A waste. The isotopic analysis of the waste material indicated that the waste should have been identified as Class B waste.

This is a Severity Level IV violation (Supplement V).

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Response

10 CFR 61.55 requires Class A waste to have a Cesium-137 concentration of less than 1 curie per cubic meter. The isotopic analysis data for the March 5 and March 6 waste shipments indicated that the Cesium 137 concentration was 0.13 curies per cubic meter above that limit. Although this information was correctly presented on the data sheets, the individual performing the review failed to note that the Cesium 137 concentration was above the level used as the cutoff criteria for Class A waste.

When notified by the Barnwell Waste Management Facility that the March 6 shipment had been mislabeled, Philadelphia Electric Company immediately re-evaluated recent isotopic analysis data and informed Barnwell that the March 5 shipment was also improperly classified. Subsequently, two other shipments, one on March 19 and one on March 20, were found to be similarly mislabeled. Notifications were also made of these violations.

This violation was primarily caused by personnel error. To avoid further violations, the individual has been counseled on the importance of the classification process and the need for careful review of the data sheets. In addition, a major revision to procedure "C.O.L. HPO/CO 71F-1 Burial Site Criteria for Barnwell, South Carolina", has been completed to provide more precise shipping information. Prior to the revision, this procedure did not present an adequate explanation of the data review process. The procedure was revised to provide step by step guidance on the review of the isotopic analysis sheets to properly classify and label a waste shipment. Additionally, the procedure now requires review by 2 qualified individuals before a waste shipment can be released.

The procedural deficiencies were identified and the corrective actions described in this response were completed prior to the inspector's review of this area.

- B. 10 CFR 71.105(d) states "....The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Contrary to the above, the Radioactive Material Coordinator involved in the two shipments of licensed waste material made on March 5, 1984, and March 6, 1984, had not received any documented indoctrination and training in the Nuclear Regulatory Commission or the Department of Transportation Regulations to assure that suitable proficiency was achieved and maintained.

This is a Severity Level IV violation (Supplement V).

Response

The Radioactive Material Coordinator involved in the March 5 and March 6 radwaste shipments attended a Regulatory Awareness Training Course held at Peach Bottom Atomic Power Station on October 18 - 19, 1982. Attendance at this training was documented in the Health Physics and Chemistry training records. This course did not, however, discuss the requirements of 10 CFR Part 61. Philadelphia Electric Company realized this prior to the inspector's review of this area and had arranged for a training session by Hittman - Westinghouse, which was held on March 27, 1984. This training was attended by the personnel involved in the four mislabeled shipments including the Radioactive Materials Coordinator. This training emphasized the special burial site criteria for Barnwell, S.C. and the requirements of 10 CFR Part 61.

The Radioactive Material Coordinator also attended a course on Regulatory Awareness Training given by Chem-Nuclear Systems, Inc. from May 21 thru May 24, 1984, at Peach Bottom Atomic Power Station. This course covered radwaste and radioactive material preparation, handling and shipping.

To prevent recurrence and to maintain the proficiency of the Radioactive Material Coordinator, a training session will be repeated once per year.

- C. 10 CFR 20.311(c) states, "Each manifest must include a certification by the waste generator that the transported materials are properly classified, described, packaged, marked, and labeled and as are in proper condition for transportation..."

Contrary to the above, on March 5, 1984, and on March 6, 1984, the shipment manifest of the two waste shipments made on these days were signed by a shift supervisor certifying that the twenty-three containers in the shipments were properly classified, when in fact the containers were not properly classified.

This is a Severity Level V violation (Supplement V).

Response

This violation was caused because procedure, "C.O.L. HPO/CO 71F-1, Burial Site Criteria for Barnwell, South Carolina", did not provide the Shift Supervisor with enough detail about the isotopic analysis data to immediately identify a 10 CFR Part 61 Class A waste discrepancy. As a result, the Cesium-137 concentration, which slightly exceeded the Class A waste criteria, was not identified during his review.

To prevent recurrence, the procedure has been revised as described in the response to Violation A. This revision should ensure that the waste classifications are correctly reviewed and specified for future waste shipments.

If you need any additional information, please do not hesitate to contact us.

Very truly yours,



cc: A. R. Blough, Site Inspector

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