



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

October 8, 1992

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Document Control Desk

Subject: LaSalle County Nuclear Power Station Units 1 and 2  
Reply to Notice of Violation  
Inspection Report Nos. 50-373/92018; 50-374/92018  
NRC Docket Nos. 50-373 and 50-374

Reference: C. Pederson letter to Cordell Reed dated September 9, 1992  
transmitting NRC Inspection Report 50-373/92018;  
50-374/92018

Enclosed is the Commonwealth Edison Company (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter and Inspection Report. The NOV concerned a waste shipment sent to the Barnwell burial site without the required information entered on the Yellow III label. CECO's response is provided in the attachment.

If your staff has any questions or comments concerning this letter, please refer them to Jim Watson, Compliance Engineer at (708) 515-7205.

Sincerely,

T.J. Kovach  
Nuclear Licensing Manager

Attachment

cc: A.E. Davis, Regional Administrator - Region III  
B.L. Siegel, Project Manager, NRR  
D. Hills, Senior Resident Inspector

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**RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT NOS.  
50-373/92018; 50-374/92018**

**VIOLATION: (IR 373(374)/92018-01)**

10 CFR 71.5 states, in part, that each licensee who transports licensed material outside of the confines of the plant shall comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation in 49 CFR Parts 170 through 189.

49 CFR 172.403(a) states, in part, that each package of radioactive material must be labeled as provided in this section.

49 CFR 172.403(g) states, in part, that the following applicable items of information must be entered in the blank spaces on the RADIOACTIVE label by legible printing: contents (a listing of the radionuclides in the package); activity (curie amount); and the transport index.

Contrary to the above, a package of radioactive spent resins was transported from the LaSalle County Station and was received at the Barnwell, S.C. burial site, on August 13, 1992, bearing a RADIOACTIVE Yellow-III label that did not have the required information of content, activity, and transport index entered in the blank spaces on the label.

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

**REASON FOR THE VIOLATION:**

CECo acknowledges the violation. The violation occurred because the procedure (LAP-100-27, "Guideline for Radioactive Waste/Material Shipments") used to verify a shipment was ready to be released from site did not provide adequate guidance for labelling. This procedure provided adequate guidance for LSA shipments, but was inadequate for other types of shipments. This was the first Yellow III shipment performed by the Radwaste department; previous shipments were LSA.

**CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED:**

An investigation was performed which determined that procedure inadequacy was the root cause.

**CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS:**

The radioactive waste shipment checklist for LaSalle County Station (contained in procedure LAP-100-27 "Guidelines for Radioactive Waste/Material Shipments") was revised on September 24, 1992, to address proper labelling of Yellow III and LSA waste shipments.

RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT NOS.  
50-373/92018; 50-374/92018

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS: (continued)

Operational personnel involved in the transportation of radioactive waste have been informed of this event and have reviewed the revised version of LAP-100-27.

Further evaluation is in progress which considers other recent waste shipping events within CECO. This evaluation and appropriate program/procedure changes applicable to LaSalle are expected to be completed by December 31, 1992.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved upon revising LAP-100-27.