

GPU Nuclear Corporation

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April 26, 1985

Mr. Harry B. Kister, Chief
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

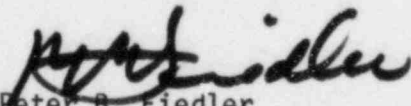
Dear Mr. Kister:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection 85-07

Attachment I to this letter provides our response to the Notices of Violation contained in Appendix A of your letter dated March 27, 1985.

In the event that any comments or questions arise, please contact Mr. Drew Holland of my staff at (609)971-4643.

Very truly yours,



Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF/DH:dam
Attachments
(0944A)

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
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Violation B

10 CFR 71.5(a) states, in part, that each licensee who delivers licensed material to a carrier for transport, shall comply with the applicable DOT regulations in 49 CFR Parts 170 through 189 appropriate to the mode of transport.

49 CFR 173.443(a) and (b) states, in part, that the level of nonfixed (removable) radioactive contamination on external surfaces of each package offered for shipment shall be kept as low as practicable. The amount of radioactivity measured on any single wiping material when averaged over the surface wiped shall not exceed 22,000 dpm beta-gamma/100 cm² at any time during transport in an exclusive use vehicle. When other methods of assessment of nonfixed contamination levels are used, the detection efficiency of the method used shall be taken into account and in no case shall the nonfixed contamination on the external surfaces of the package exceed ten times the above limit (220,000 dpm beta-gamma/100 cm²).

Contrary to the above, on February 3, 1984, the level of nonfixed radioactive contamination on the external surface of the TN9-1 cask containing spent fuel assemblies and received on January 31, 1985 was in excess of 220,000 dpm beta-gamma/100 cm². Specifically, the contamination levels were 455,000 and 400,000 dpm beta-gamma/100 cm² at survey locations 10 and 15.

Response B

GPUN concurs with the violation as stated. Delayed cask shipments are resurveyed and decontaminated if necessary within 24 hours of shipment to verify significant leaching has not occurred. Receipt surveys have been expedited to minimize leaching time. There have been several casks which have leached contamination greater than 22,000 dpm/100 cm² but not greater than regulatory limits when efficiency methodology has been applied.

A corporate metallurgist was assigned to resolve the source of contamination leaching and to recommend a chemical decontamination technique for cask surfaces with higher beta fixed contamination levels. This process will be implemented upon approval by the cask owner and should preclude future noncompliances.

Full compliance was achieved February 5, 1985.

ATTACHMENT I

Violation A

10 CFR 20.205(b)(1) states that each licensee, upon receipt of a package of radioactive material, shall monitor the external surface of the package for radioactive contamination caused by leakage of the radioactive contents. The monitoring shall be performed as soon as practicable after receipt, but no later than three hours after the package is received at the licensee's facility if received during the licensee's normal working hours.

Contrary to the above, a package of radioactive material, namely, the TN9-1 cask containing spent fuel elements, was received at the Oyster Creek Nuclear Generating Station at about 3:00 P.M. (during normal working hours) on January 31, 1985, and monitoring of the external surfaces of the package for radioactive contamination was not performed until about 3:30 A.M. on February 3, 1985, over 60 hours after receipt of the package.

Response A

GPUN concurs with the violation as stated. The cask handling procedure was revised to include the three hour incoming cask survey and to specify that the sequence of work on an existing cask can be interrupted in order to comply with the timeliness requirement for an incoming cask survey (this need had been referenced in the original procedure). The timeliness requirement has been emphasized to all personnel associated with cask handling. All personnel associated with cask handling have been briefed on regulation 10 CFR 20.205(b)(1). The survey time period requirement has been met on all subsequent TN-9 shipments.

Provisions have been made to ensure that any TN-9 cask receipt can be surveyed within the required three hour time frame. Shipping and cask handling operations have been organized to the extent that this initial survey can be conducted in the reactor building airlock.

Full compliance was achieved February 5, 1985.