

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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July 19, 1985

Docket Nos. 50-245

50-336

A05002

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

Reference: (1) Letter, Thomas E. Murley to John F. Opeka, dated
June 18, 1985, Inspection Report Nos. 50-245/85-11
and 50-366/85-14.

Gentlemen:

Millstone Nuclear Power Station, Unit Nos. 1 and 2
Response to I&E Inspection Nos. 50-245/85-11 and 50-336/85-14

Pursuant to the provisions of Section 2.201 of the NRC's Rules of Practice, Part 2, Title 10 Code of Federal Regulations, this report is submitted in reply to Reference (1).

Reference (1) informed the Northeast Nuclear Energy Company (NNECo) of a Severity Level III Violation as a result of an item of non-compliance noted during an inspection conducted by a representative of the South Carolina Department of Health and Environmental Control on a tractor-trailer containing licensed material.

VIOLATION

As a result of the inspection conducted on March 11, 1985, by a representative of the South Carolina Department of Health and Environmental Control of a shipment of licensed material sent from your facility in Waterford, Connecticut, on or about March 8, 1985 and in accordance with the NRC Enforcement Policy (10CFR2, Appendix C) the following violation was identified.

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10CFR71.45, "External Radiation Standards For All Packages," states that a package must be designed and prepared for shipment so that the radiation level does not exceed 200 millirem per hour at any point on the external surface of the package. The regulation also states that the radiation level at any point on the external surface of the package may exceed 200 millirem per hour but the shipment must be made in a closed transport vehicle.

Contrary to the above, on March 11, 1985, a waste shipment containing 564 millicuries of licensed material was transported to the Chem Nuclear Systems, Inc. burial site at Barnwell, South Carolina on an open, flatbed tractor trailer, and one package (Package No. 84-1114-1) was found to have a radiation level of 380 millirem per hour on the external surface of the package.

RESPONSE

The Radioactive Materials Handling Department has been reorganized with the Radioactive Material Handling Supervisor now reporting to the Health Physics Supervisor. A procedure RW60012/260012/360012, "Packing Non-Compactible LSA Containers" has been written and implemented. This procedure precludes any item greater than 160 mr/hr from being placed into a non-compactible LSA box. Also, LSA non-compactible boxes are inspected by Station Management and Quality Control prior to their being sealed.

The above action was implemented July 1, 1985. This action should preclude this type of incident from reoccurring.

Reference (1) also informed the Northeast Nuclear Energy Company (NNECo) of a Severity Level IV Violation as a result of an item of non-compliance noted during inspection on April 15-19, 1985.

VIOLATION

Technical Specification 6.8.1 requires, in part, that written procedures be implemented. Administrative Control Procedure No. ACP-QA-4.04, "Instructions for Packing, Shipping, Receiving, Storage and Handling," requires, in part, that Category I materials, equipment, and parts shipped to the site be inspected by the Quality Assurance Organization upon receipt. Category I Items and Services in the licensee's Quality Assurance Topical Report include those associated with the preparation of radioactive wastes for shipment.

Contrary to the above, prior to August 27, 1984, a vendor-supplied radwaste solidification system was received at the Millstone site, used in the preparation of thermal shield radioactive waste shipment on or about August 27, 1984, November 2, 1984 and December 18, 1984 and receipt inspections on this system were not performed.

RESPONSE

Administrative Control Procedure ACP 2.01A, "Radioactive Waste Packaging and Shipping QA Program" has been written. This procedure describes how and to what extent the QA program applies to the preparation of radioactive wastes for shipment. In accordance with this procedure services performed on site by vendors for use in radioactive shipment preparation and transport will be controlled by application of the approved NNECo Quality Assurance Program. This action will be completed by August 1, 1985.

Reference (1) also identified nine areas of weaknesses during the inspection held on April 15-19, 1985.

WEAKNESS-1

Lack of attention to technical detail was noted in several shipments of licensed materials, e.g. incorrect contact dose rates, incorrect recipient license, and failure to address conditions of Certificates of Compliance.

RESPONSE

Radioactive shipments are being reviewed by several levels of Millstone management. In addition, attention to technical detail was reemphasized to all department personnel. This action should preclude this inattention to technical detail from recurring.

WEAKNESS-2

Procedures lacked step-by-step instructions in the degree of detail necessary to perform the activity and acceptance criteria against which success or failure of an activity could be judged.

RESPONSE

All Radwaste Procedures are being reviewed and rewritten as necessary to incorporate step-by-step instructions. This will be completed by August 1, 1985.

WEAKNESS-3

Apparent lack of management oversight of packaging and shipping activities, e.g. inadequate supervision of packaging and transportation activities during the absence of the Radioactive Material Handling Supervisor; inactive Radioactive Review Committee; the Radiological Services Supervisor did not examine radioactive materials transportation records and logs as required by the procedures.

RESPONSE

Radioactive shipments are being reviewed by several levels of management at Millstone. Radwaste activities are being monitored by the Health Physics Supervisor and the Radiological Services Supervisor.

The Health Physics Supervisor is now the responsible person in the absence of the Radioactive Material Handling Supervisor.

The Radioactive Review Committee has been reinstated. A meeting was held during June 1985 to discuss current radwaste problems and to make recommendations to the Vice President Nuclear Operations. The above actions were implemented July 1, 1985 and should preclude this finding from recurring.

WEAKNESS-4

Quality Assurance Auditor lacked technical expertise in shipping-related areas.

RESPONSE

Corporate Quality Assurance Inspectors assigned to perform audits in radioactive transportation area will be trained and will have the appropriate technical expertise to perform the audits. This will be completed prior to the next Radwaste Audit.

WEAKNESS-5

Additional training was needed for technicians acting in upgraded positions.

RESPONSE

This Senior Radiation Protection Technician no longer assumes the duties of the Radioactive Materials Handling Supervisor (RMHS) in the latter's absence. The Health Physics Supervisor assumes the duties of the RMHS. Radwaste Technicians and Health Physics Technicians acting in upgraded positions will be given specific instructions as to their responsibilities and authority. These actions will be implemented by August 1, 1985.

WEAKNESS-6

The Quality Control Program was limited in scope with regard to the requirements of 10CFR61.55 and 10CFR61.56.

RESPONSE

The QC Program scope will be expanded to include the entire process and operation.

WEAKNESS-7

Retrieval of shipment records was difficult.

RESPONSE

Radioactive shipment records as of 1 July 1985, are being stored as a package. Future retrievals will be accomplished with the entire shipping package being made available.

WEAKNESS-8

Corporate Quality Assurance Implementing Procedures did not reflect transport packages as Category I Item as established by the QA Topical Report.

RESPONSE

ACP 2.01, "QA Boundary Program" has been revised to indicate that items and services associated with radioactive waste packaging and transportation are considered Category I QA. ACP 2.10A, "Radioactive Waste Packaging and Shipping QA Program" has been written. This procedure describes how and to what extent the QA Program applies to the preparation and shipment of radioactive materials. This procedure reflects the QA Topical Report requirements. These procedures will be effective by August 1, 1985.

WEAKNESS-9

Infrequent QA monitoring of radioactive materials packaging and transportation activities.

RESPONSE

The QA Department will expand the scope and frequency of the monitoring program for radioactive materials packaging and transportation activities.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka

Senior Vice President