

APPENDIX A

NOTICE OF VIOLATION

Northeast Nuclear Energy Company
Millstone Nuclear Power Station

Docket Nos. 50-245
50-336
License Nos. DPR-21
DPR-65

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 (10 CFR 2, Appendix C) the following violation was identified.

10 CFR 71.45, "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.

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

Pursuant to the provisions of 10 CFR 2.201, the Northeast Nuclear Energy Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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APPENDIX B

NOTICE OF VIOLATION

Northeast Nuclear Energy Company
Millstone Nuclear Power Station

Docket Nos. 50-245
50-336
License Nos. DPR-21
DPR-65

As a result of the inspection on April 15-19, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

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 shipments on or about August 27, 1984, November 2, 1984 and December 18, 1984 and receipt inspections on this system were not performed.

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

Pursuant to the provisions of 10 CFR 2.201, the Northeast Nuclear Energy Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

APPENDIX C

Licensee Weaknesses

The inspection team has identified items of concern which have been characterized as weaknesses. An item of weakness does not constitute noncompliance with regulatory requirements, rather it is related to effectiveness of a program, activity or organization. References are to paragraphs in Inspection Report 50-245/85-11; 50-336/85-14.

1. A 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 (Para. 5).
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 (Para. 7.2).
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 (Para. 3.2).
4. Quality Assurance auditor lacked technical expertise in shipping-related areas (Para. 4.3).
5. Additional training was needed for technicians acting in upgraded positions (Para. 4.1).
6. The Quality Control program was limited in scope with regard to the requirements of 10 CFR 61.55 and 10 CFR 61.56 (Para. 6.1).
7. Retrieval of Shipment records was difficult (Para. 5).
8. Corporate Quality Assurance implementing procedures did not reflect transport packages as a Category I item as established by the QA Topical Report (Para. 6.2).
9. Infrequent QA monitoring of radioactive materials packaging and transportation activities (Para. 6.1).