



CONNECTICUT YANKEE ATOMIC POWER COMPANY

TELEPHONE
203-665-5000

BERLIN, CONNECTICUT
P.O. BOX 270 HARTFORD, CONNECTICUT 06141-0270

July 26, 1985

Docket No. 50-213
A05012

Mr. Thomas T. Martin, Director
Division of Radiation Safety and Safeguards
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Reference: (1) T. T. Martin letter to J. F. Opeka, dated July 1, 1985.

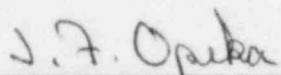
Gentlemen:

Haddam Neck Plant
Response to I&E Inspection 50-213/85-09

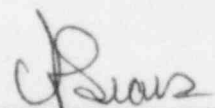
Pursuant to the provisions of the NRC's Rules of Practice (10CFR2), this report is submitted in response to Reference (1) which informed the Connecticut Yankee Atomic Power Company (CYAPCO) of one violation and seven licensee program weaknesses. These items were identified during a special announced inspection at the Hadam Neck Plant from April 8 through April 12, 1985. Attached are our responses to Appendices A and B.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



J. F. Opeka
Senior Vice President



By: C. F. Sears
Vice President

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APPENDIX A

RESPONSE TO NOTICE OF VIOLATION

VIOLATION

"Technical Specification 6.8 requires, in part, that written procedures shall be established, implemented and maintained. Each of these procedures shall be reviewed by the Plant Operating Review Committee (PORC) and approved by the Station Superintendent, prior to implementation.

Section 4.3 of Procedure No. QA 1.2-7.1 states that the QA/QC Department is responsible for performing receipt inspections in accordance with the procedure.

1. Contrary to the above, a NUS Solidification System, a system designated as Radwaste QA, was received on site during the period of September-October 1984, and the QA/QC Department did not perform receipt inspections on the system in accordance with the procedure.
2. Contrary to the above on several occasions during October 1984-March 1985, the licensee has implemented at least one vendor procedure (Procedure No. SS-008, Revision E "Operating Procedure for NUSPSC Radwaste Solidification No. 8921") and the procedure was not reviewed by the PORC, and neither was it approved by the Station Superintendent prior to implementation.

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

RESPONSE

Item 1

Station procedure ACP 1.2-7.1, "Receipt, Inspection and Identification of Materials, Parts and Components" has been revised via a temporary procedure change (No. 85-73) to clarify the responsibility of personnel authorizing vehicles making deliveries directly into the protected area (vice to the warehouse) to ensure that the appropriate Quality Assurance actions are taken. Since deliveries to the warehouse are adequately addressed by current procedures, this change to ACP 1.2-7.1 will ensure that the Quality Assurance Department will be cognizant of, and receipt inspect as appropriate, all QA-related deliveries.

Item 2

NUS procedure No. SS-008, Revision E was PORC reviewed and approved for use by the Station Superintendent on June 3, 1985. In the future, all procedures of this nature will be reviewed by PORC and approved by the Station Superintendent prior to use.

APPENDIX B

RESPONSES TO LICENSEE PROGRAM WEAKNESSES

LICENSEE PROGRAM WEAKNESS NO. 1

"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)".

RESPONSE

Connecticut Yankee is presently evaluating alternatives for upgrading its 10 CFR 61 Quality Control Program. Enhancement of this program is anticipated to be completed by December 31, 1985.

LICENSEE PROGRAM WEAKNESS NO. 2

"The site Quality Control Inspectors, providing an independent review of the adherence to shipping and radwaste requirements, were inadequately trained in shipping and radwaste disposal requirements (Paragraph 4)."

RESPONSE

The Connecticut Yankee Quality Assurance training program will be reviewed and revised as needed to upgrade the training of inspectors in radwaste shipping and disposal requirements. Procedural changes needed to implement this upgrade will be completed by October 1, 1985.

LICENSE PROGRAM WEAKNESS NO. 3

"Shipping and radwaste procedures exhibited weakness in that:

- o ACP No. 1.2-13.5 referenced inappropriate sections of RAP 6.3-5 for acceptance criteria for shipping containers (Paragraph 7);
- o Tables providing scaling factors for compliance with 10 CFR 61 were not provided and controlled under RAP No. 6.3-5 (Paragraph 7);
- o Records of calculations utilizing dose rate to curie conversion factors were not available for review (Paragraph 7);

- o Current procedures did not establish adequate controls to evoke recharacterization of waste streams upon significant changes in the reactor coolant activity (Paragraph 7)."

RESPONSE

- o The reference deficiency in ACP No. 1.2-13.5 (Rev. 8) was identified by CYAPCo and corrected on April 8, 1985 (the effective date of RAP 6.3-5, Rev. 22) by Temporary Procedure Change (TPC) No. 85-43. The problem was permanently corrected by Revision 9 to ACP 1.2-13.5 on June 7, 1985.
- o Tables providing scaling factors for 10 CFR 61 compliance were incorporated into RAP 6.3-5 in Revision 23 dated June 7, 1985.
- o A file for calculations utilizing dose rate to curie conversion factors was established by the Connecticut Yankee Radioactive Materials Handling Supervisor on May 1, 1985.
- o SUR 5.6-14 was revised (Revision 2) on June 7, 1985 to incorporate controls to ensure recharacterization of waste streams upon significant changes in reactor coolant activity.
- o All written procedures related to radioactive waste will be reviewed and revised as necessary to ensure their adequacy. This will be completed by September 1, 1985.

LICENSEE PROGRAM WEAKNESS NO. 4

"Inactive Radwaste Review Committee (Paragraph 3)."

RESPONSE

The Radwaste Review Committee held a meeting on May 22, 1985. The current problems facing Northeast Utilities in the Radwaste area were discussed. The group decided that it would be beneficial to key on the results of the Radioactive Waste Transportation Review Group when their report is made available.

LICENSEE PROGRAM WEAKNESS No. 5

"Lack of site QA involvement in radwaste system modifications (Paragraph 6)."

RESPONSE

In addition to the measures delineated in Appendix A, Item 1 (of this letter) to ensure QA receipt inspections are performed when appropriate, procedures for use with the NUS Solidification System will be revised to include QA "hold points". These hold points will upgrade the level of QA involvement with the solidification system. The procedural revisions discussed above will be completed prior to use of this system and no later than September 1, 1985. The solidification unit is currently not on site.

LICENSEE PROGRAM WEAKNESS NO. 6

"Corporate QA implementing procedures did not reflect the Topical Report Classification of radwaste activities as a Category 1 area (Paragraph 5)."

RESPONSE

Connecticut Yankee QA implementing procedures have been revised (as of June 21, 1985) to specifically address the applicability of the QA Program to radwaste activities. These procedural revisions were initiated in response to NRC Information Notice #84-50, "Clarification of Scope of Quality Assurance Programs for Transport Packages Pursuant to 10 CFR 50, Appendix B."

Corporate level (NE&O) procedural guidance for radwaste activities does not exist. This had been identified prior to your inspection through a Corporate QA Audit (A60425, April 1985). As a result of that audit, we are evaluating the development of an NEO Procedure for radwaste activities.

LICENSEE PROGRAM WEAKNESS NO. 7

"Radwaste Transportation audit was performed without technical expertise participating in the audit (Paragraph 6)."

RESPONSE

We agree that personnel performing QA audits should have a degree of technical competence in the area being audited. This is accomplished in one of two ways: training the QA auditor or utilizing additional individuals who possess the required level of technical expertise. We will ensure that future QA audits of radwaste shipping will utilize technically competent auditors, either by utilizing QA personnel who have received additional training or by supplementing the audit team with individuals with the required expertise.