

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-219/85-25

Docket No. 50-219

License No. DPR-11 Priority -- Category C

Licensee: GPU Nuclear Corporation
P. O. Box 388
Forked River, New Jersey 08731

Facility Name: Oyster Creek Nuclear Station

Inspection At: Forked River, New Jersey

Inspection Conducted: July 29 - August 1, 1985

Inspectors: P. Clemons
P. Clemons, Radiation Specialist

9/4/85
date

M. Kramaric
M. Kramaric, Radiation Specialist

9/4/85
date

M. Miller
M. Miller, Radiation Specialist

8/28/85
date

Approved by: W. J. Pasciak
W. J. Pasciak, Chief
BWR Radiological Protection Section

9/6/85
date

Inspection Summary:

Inspection on July 29 - August 1, 1985 (Report No. 50-219/85-25)

Areas Inspected: Routine, unannounced safety inspection of transportation activities including: management controls, training, quality assurance, audits, package selection, shipment of radioactive materials, and low-level radioactive waste storage facility.

Results: One violation was identified: Failure to conduct a quality control program paragraph 5.0.

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DETAILS

1.0 Persons Contacted

1.1 Licensee Personnel

*P. Fiedler,	Vice President and Director, Oyster Creek
*J. Sullivan Jr.,	Plant Operations Director
*D. Turner,	Radiological Controls Director
*R. Fenti,	Quality Assurance (QA) Mod/Ops Manager, Oyster Creek
*S. Fuller,	Ops QA Manager
*R. Markowski,	QA Program Development/Audit Manager, GPUN
*G. Simonetti Jr.,	Audit Manager, Oyster Creek
*T. Snider,	Radwaste Operations Manager
*A. Wacha,	Radwaste Shipping Supervisor
R. Hurley,	Group Radwaste Shipping Supervisor
B. Schlotens,	QA Lead Monitor
W. Spoulos,	Group Radwaste Packaging Supervisor
*P. Czaya,	Licensing Engineer
*B. Hohman,	Licensing Engineer

1.2 Vendor Personnel

M. O'Kelly, Waste Management Inc.

1.3 NRC Personnel

*B. Bateman, Senior Resident Inspector

* denotes attendance at the exit interview on August 1, 1985.

2.0 Purpose

The purpose of this routine inspection was to review the licensee's transportation activities with respect to the following elements:

- Management Control
- Training
- Quality Assurance
- Audits
- Solid Radioactive Waste System and Processing
- Package Selection
- Shipment of Radioactive Materials
- Low-Level Radioactive Waste Storage Facility Status

3.0 Management Control

The responsibility for the administration, technical direction and implementation of the licensee's Process Control Program (PCP) for liquid and solid radioactive waste and for shipment of radioactive material is the

function of the Radwaste Operations Manager. Overall responsibility for radioactive waste management resides with the Plant Operations Director, who reports to the Vice President and Director of Oyster Creek.

The licensee had documented the management control for radioactive waste management in Procedure 101, Revision 15, "Organization and Responsibility." The inspector discussed with the Radwaste Operations Manager and Radwaste Shipping Supervisor the responsibilities and authorities of the individuals designated in the Radwaste Operations organization chart. The inspector noted that vendor support was being used for operations and monitoring of the solidification process, and for classification and characterization of radioactive waste.

All of these activities were governed by procedures which specify methods for handling, processing, sampling, and shipment of radioactive waste. For example, Procedure 101.3, Revision 12, "Shipment of Radioactive Material" described the requirements for radioactive material and radioactive waste shipments. This procedure also detailed the responsibilities of the Radwaste Shipping Supervisor and the responsibilities of other support group.

Within the scope of this review, no violations were identified.

4.0 Training

Personnel training in transportation activities was reviewed against the criteria contained in IE Bulletin 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial."

The licensee's performance relative to this criteria was determined by discussions with the Radwaste Operations Manager, Radwaste Shipping Supervisor and other supervisory personnel, and by review of training documentation.

Within the scope of this review no violations were identified. However, the following concern was identified:

- On September 24, 1979, in response to Item 5 of IE Bulletin 79-19, the licensee stated that training and periodic retraining in the DOT and NRC regulatory requirements was being provided to the health physics personnel. The inspector discussed with the licensee, that since a new organization was now performing the radwaste packaging and shipment function, the licensee's training commitments should be revised to define the current training and retraining program. The inspector also noted that during 1984 no formalized training was provided to licensee personnel responsible for radioactive waste/material shipment. Another letter, clarifying the intent of the

licensee's response to IE Bulletin 79-19, should be submitted to the Regional Administrator in the near future. This item will be reviewed during a subsequent inspection (219/85-25-01).

5.0 Quality Assurance Program

The implementation of the licensee's Quality Assurance Program (QAP) for transport packages was reviewed against the criteria contained in 10 CFR 71, "Subpart H - Quality Assurance," and 10 CFR 50, Appendix B.

The licensee's performance relative to this criteria was determined from discussions with the QA Mod/Operations Manager, QA Operations Manager, the QA Operations Lead Monitor, and from review of the QA Mod/Operations Monitoring Program, Revision 5, and the QA monitoring reports for 1985 with regard to radioactive waste processing and shipments.

Within the scope of this review, the following violation was identified:

- 10 CFR 20.311(d)(3), "Transfer for disposal and manifests" requires a licensee who transfers radioactive waste to a land disposal facility to conduct a quality control program to assure compliance with 10 CFR 61.55 and 10 CFR 61.56.

The licensee has transferred several radioactive waste shipments to a land disposal facility during 1984 and 1985 and the licensee has not conducted a quality control program to assure compliance with 10 CFR 61.55 and 10 CFR 61.56, inasmuch as the licensee has not verified that spent resin contained less than 1% liquid by volume when the resin was in a disposal container (high integrity container) designed to ensure stability; and neither did the licensee verify that the solidification process was as effective as described in the Topical Report. In addition, the licensee QA inspection program did not verify that the computer program used in waste classification performed the required functions.

Failure to conduct a quality control program to assure compliance with 10 CFR 61.55 and 10 CFR 61.56 represents a violation of 10 CFR 20.311(d)(3) (219/85-25-02).

Within the scope of this review, the following concern requiring licensee attention was also identified:

- The licensee had identified all structures, systems and components to be covered by the quality assurance program on a document designated as a Q List. However, transport packages were not included on this list. Rather, 10 CFR 71 was listed as an area for which the Quality Control Program would be applied. The licensee stated that the Q List was being revised and only owner

equipment and components would be on the Q List. Therefore, transport packages, as well as other non-owner equipment would be addressed by QAP procedures or an appropriate vendor list. The inspector stated implementation of the QAP process will be reviewed during a subsequent inspection (219/85-25-03).

6.0 Audits

The adequacy and effectiveness of the licensee's audit program for transport packages were reviewed against the criteria contained in Criterion XVIII of Appendix B, 10 CFR 50, and with respect to Technical Specification 6.5.3.5, "Audits."

The licensee's performance relative to these criteria was determined by review of Audit S-OC-84-14, "Radwaste Shipping and Operations," dated August 8 through October 8, 1984 and discussions with the Audit Manager and QA Program Development/Audit Manager. The qualifications of the auditor were reviewed relative to ANSI N45.2, "Quality Assurance Program Requirements for Nuclear Facilities."

Within the scope of this review, no violations were identified. However, the following concern was identified:

- The Audit System Plan addressed the 10 CFR 50 Appendix B criteria for transport packages. However, the focus of the Radwaste Audit S-OC-84-14 was to determine the adequacy of procedure compliance. The inspector noted that performance against the other designated 10 CFR 50, Appendix B criteria was marginally evaluated. The licensee stated that subsequent audits would ensure Radwaste Shipping activities would be audited against the applicable criteria. This area will be reviewed during a future inspection (219/85-25-04).

7.0 Selection of Packages

The licensee's program for selection of packages was examined against the requirements of 10 CFR 71.87 and within the framework of the DOT requirements of 49 CFR Part 173.

For dry radioactive waste, the licensee used steel boxes or strong tight containers. Radioactive material shipments requiring the use of an NRC Certified package (outer container) were made predominantly in vendor supplied containers.

Within the scope of this review, the following issues were identified:

- The inspector observed an NRC approved package (Certificate of Compliance (C of C 9094) labeled as model 14-195 and DOT-7A. The C of C specifies Model number 14-195 as an approved package. However, the DOT-7A labeling is not permitted by C of C 9094, because it implies NRC approval.

- The inspector noted that the licensee had made radioactive waste shipment in an approved package (Certificate of Compliance 9079), but was shipped as package model 14-170. Model 14-170 currently is not approved by C of C 9079.

The licensee stated they would discuss these labeling conflicts with their vendor. The inspector stated these issues would be considered unresolved (219/85-25-05).

Except as noted above, copies of the Certificate of Compliance, including the drawings were available for all Type A and Type B Casks in use.

8.0 Shipment of Licensed Material for Disposal or Use

The transportation of licensed material was reviewed against the criteria contained in 10 CFR 71, "Packaging and Transportation of Radioactive Material," 10 CFR 20.311(d)(3), "Transfer for disposal and manifests," and 10 CFR 61.55, "Waste Classification," and 10 CFR 61.56, "Waste Characteristics."

The licensee's performance relative to these criteria was determined by the following:

- discussion with the Radwaste Shipping Supervisor and his staff;
- review of shipping manifests and related documents; and
- review of selected program procedures including the following:
 - 101.3, Revision 12, "Shipment of Radioactive Materials."
 - 351.2, Revision 3, "Absorbing of Low-Level Radioactive Waste Oil for Off-Site Disposal."
 - 351.37, Revision 1, "Radwaste Processing of Solids and Liquid to the CNSI Cement Solidification System."
 - 352.0, Revision 4, "Processing Resins at the Large Container Filling Station Into a CNSI Enviro Safe High Integrity Container."

Within the scope of this review, no violations were identified.

9.0 Low-Level Radioactive Waste Storage Facility

The licensee has started construction of a Low-Level Radioactive Waste Storage Facility at the Oyster Creek Site. Projected completion is March 1986. The licensee estimated that 50% has been completed as of July 31, 1985. The Safety Evaluation Report is currently in draft.

10.0 Exit

The inspector met with the licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on August 1, 1985. The inspector summarized the scope of the inspection and findings.