



Allied Corporation
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December 20, 1985
Certified P671-100-095

04003392
SUB-526

Mr. Jack A. Hind, Director
Division of Radiation Safety
and Safeguards
USNRC, Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Hind:

In response to the Notice of Violation issued on December 4, 1985 resulting from your routine inspection of October 28 through November 1, 1985; please be advised that the State of South Carolina has reinstated our Waste Transport Permit effective November 6, 1985.

In order to assure compliance with NRC regulations concerning this matter, we have taken the corrective actions specified in the attached response to "Notice of Violation".

If you have any questions regarding these corrective actions, please do not hesitate to call.

Sincerely,

A. J. Cipolla

A. J. Cipolla
Plant Manager

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Allied Corporation
Response to Notice of Violation Dated December 4, 1985

Item 1

Contrary to 49 CFR 173.425(b) (1) a metal bin containing LSA Waste was shipped to Chem Nuclear at Barnwell, South Carolina with unabsorbed liquid leaking through a pin hole in the welded section of the drain plug.

We have taken the following corrective actions for this violation:

- A. We have contacted the manufacturer of the shipping container to request improvements in the manufacturing quality control for inspection of container welds.
- B. We have revised our plant procedure for preparing these shipments to include the following:
 - 1. Thorough inspection of each container prior to filling by our plant personnel.
 - 2. More thorough instructions, and sensitization of plant employees that no liquids, including rain water, are allowed in containers prepared for shipment.

Item 2

Contrary to 10CFR20.311(d) (3) and 10CFR61.56(a) (2) the quality control program failed to assure that the presence of liquids in solid waste packages would be adequately absorbed.

We have taken the following corrective actions for this violation:

- A. We have doubled the amount of absorbent material placed in the bottom of each container.
- B. We have revised the plant procedure for preparing these shipments to include the following quality control checks:
 - 1. The drain plug on each container is removed on three (3) separate occasions during preparation to assure the absence of any liquid. The container is also tilted

toward the drain plug to maximize the discovery of liquids.

2. The plywood placed in the bottom of each container has been repositioned to assure it will not inadvertently seal over the drain plug and obscure the presence of liquids during subsequent inspections.
3. Increased supervisory surveillance and inspection of each filled container is provided prior to shipment.
4. Quality control check sheets have been prepared for filling and shipping these containers. Employees responsible for filling, preparing, inspecting, and loading the containers sign the sheets to document their portion of the work performed.

The corrective actions listed for violation items No. 1 and No. 2 were effective November 6, 1985.