

NOV 25 1985

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

Philadelphia Electric Company
ATTN: Mr. S. L. Daltroff
Vice President
Electric Production
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

Subject: Combined Inspection Nos. 50-277/85-31 and 50-278/85-28

This refers to your letter dated October 30, 1985, in response to our letter dated September 25, 1985.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,
Original Signed By:

for Donald R. Bellamy
Thomas T. Martin, Director
Division of Radiation Safety
and Safeguards

cc:

R. S. Fleischmann, Station Superintendent
John S. Kemper, Vice President, Engineering and Research
Troy B. Conner, Jr., Esquire
W. H. Hirst, Director, Joint Generation Projects Department, Atlantic Electric
Eugene J. Bradley, Esquire, Assistant General Counsel
Raymond L. Hovis, Esquire
Thomas Magette, Power Plant Siting, Nuclear Evaluations
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

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PDR ADOCK 05000277
PDR

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11/19/85

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bcc:
Region I Docket Room (with concurrences)
Management Assistant, DRMA
Section Chief, DRP

RI:DRSS
Pasciak/ms

11/20/85

RI:DRSS
Bellamy

11/21/85

OFFICIAL RECORD COPY

RL PB 85-28 - 0002.0.0
11/19/85

PHILADELPHIA ELECTRIC COMPANY

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PHILADELPHIA, PA. 19101

(215) 841-5020

M. J. COONEY
MANAGER

NUCLEAR PRODUCTION
ELECTRIC PRODUCTION DEPARTMENT

October 30, 1985

Docket Nos. 50-277
50-278

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

Dear Mr. Martin:

Your letter dated September 25, 1985 forwarded combined Inspection Report 50-277/85-31; 50-278/85-28 for Peach Bottom Atomic Power Station, Units 2 and 3 and required a response by October 25, 1985. We were unable to meet that date due to difficulties in obtaining all of the details relating to the event. This delay was discussed with Mr. S. J. Collins of your staff on October 30, 1985 by W. M. Alden, the Engineer-In-Charge of our Licensing Section.

Appendix A of your letter addresses three items which do not appear to be in full compliance with NRC requirements. These items are restated and followed by Philadelphia Electric Company's response.

Violations A and B

Violation A

10 CFR 7.5(a) requires each licensee who delivers licensed material to a carrier for transport to comply with the requirements of the regulations appropriate to the mode of transport of the Department of Transportation in 49 CFR 170 through 189. 49 CFR 172.203(d)(iii) requires the activity contained in the shipment to be included in the shipping papers.

~~8511070415~~ (5PP)

Contrary to the above, shipping papers accompanying your shipment No. 145-85 on July 7-9, 1985, incorrectly listed the individual radioisotopic activities and their total activity.

This is Severity Level IV Violation (Supplement V).

Violation B

10 CFR 20.311(c) requires, in part, that each shipping manifest include a certification by the waste generator that the transported materials are properly described.

Contrary to this requirement, the shipping manifest accompanying your Shipment No. 145-85 on July 7-9, 1985, certified that the transported materials were properly described when the individual and total radioisotopic activities were incorrect.

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

Response to Violations A and B

Admission or Denial of Alleged Violations:

Philadelphia Electric Company acknowledges the violations as stated.

Reason for Violations:

The incident occurred because the Reactor Engineer who coordinated the shipment failed to inform the Radioactive Material Coordinator that he had put a different preloaded liner into the cask for shipment No. 145-85; therefore, the previously prepared paperwork was not changed accordingly. Fuel Handling Procedure FH-48C did not specify verification steps to prevent such a personnel error from causing this incident. As a result, the contents of liner #98 were loaded and shipped instead of the contents of liner #10, for which the paperwork had been completed. Consequently, the cask of shipment No. 145-85 contained four control rod blades of greater activity than its shipping papers identified.

Extent or Significance of Violations:

The amount of radioactivity stated on the shipping papers was incorrect. The shipping papers should have identified 7,643 curies instead of 4,984 curies. However, the extent of shielding used was sufficient to maintain dose rates on the outside of the shipping cask well below regulatory limits. The burial site was notified of this discrepancy before the cask was unloaded. Therefore, the safety significance of this event is minimal.

Corrective Actions Taken and Results Achieved:

Fuel Handling Procedure FH-48C has been revised to require a Q.C. Inspector, the Task Coordinator, and the Radwaste Material Coordinator to verify that the serial number of the preloaded liner placed in the shipping cask agrees with the serial number identified on the prepared shipping papers, at the time the liner and its contents are loaded into the cask. Also, a Health Physics/Chemistry Operations Procedure (HPO/CO 71Y) has been written and approved to require a final comparison of the liner serial number on the proposed shipping papers with that recorded on the completed checkoff sheets of FH-48C before release of the shipment.

An additional 13 shipments have been made using the revised procedure, FH-48C, without further non-compliance.

Corrective Actions to be Taken to Avoid Future Non-Compliance:

The corrective actions for this violation are complete as described above and should prevent future non-compliance.

Date When Full Compliance Will be Achieved:

Full compliance has been achieved.

Violation C

10 CFR 71.87(i)(2) requires, in part, that levels of non-fixed radioactive contamination on the external surfaces of each package offered for shipment as exclusive use shipments

not exceed 220 disintegrations per minute per square centimeter at any time during transport.

Contrary to this requirement, non-fixed radioactive contamination in the trunion cup area of the FSV-1 cask (an external surface of the shipping package) used in your Shipment No. 169-85 to the low-level waste burial site in South Carolina exceeded 220 disintegrations per minute per square centimeter upon arrival on July 30, 1985. Non-fixed radioactive contamination was measured to be 320 and 480 disintegrations per minute per square centimeter.

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

Response to Violation C

Admission or Denial of Alleged Violation:

Philadelphia Electric Company acknowledges the violation as stated.

Reason for Violation:

The FSV-1 Cask is loaded under water and a final drain is performed after the cask is placed on the truck in the trunion cup. The area where the contamination was found was not accessible with the cask positioned on the truck and, therefore, was not surveyed by the HP Technician during the final survey. The HP technician saw water drip from the cask into the trunion cup during the final drain process. Because the water dripped into the inside of the trunion cup, steps were not taken to make the area accessible for survey because it was not clear to the personnel involved that the inside of the trunion cup should be considered an "external surface".

Extent of Significance of Violation:

The contamination measurements indicated that regulatory limits were exceeded by a range of 100 to 260 disintegrations per minute per square centimeter; however, during transport the contaminated area was inaccessible to personnel. Additionally, after unloading the cask, standard practice at the burial site is to cover the trunion cup with plastic. Therefore, the safety significance of this incident is minimal.

Corrective Actions Taken and Results Achieved:

Fuel Handling Procedure FH-48C was revised to require the cask to be off loaded from the truck after the final water draining step has been completed. The trunion cup area and any other area which may have been contaminated, will be surveyed and smeared for loose contamination, and decontaminated if necessary, to meet shipping criteria.

Corrective Actions to be Taken to Avoid Future Non-Compliance:

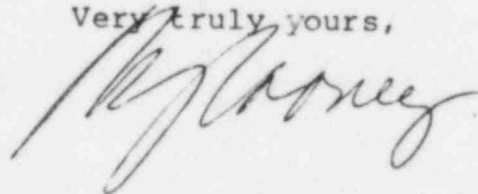
The corrective actions for this violation are complete as described above and should prevent future non-compliance.

Date When Full Compliance Will be Achieved:

Full compliance has been achieved.

Should you have any questions or require more information, please do not hesitate to call us.

Very truly yours,



cc: T. P. Johnson, Resident Site Inspector