

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-482/85-39

Operating License: NPF-42

Docket: 50-482

Licensee: Kansas Gas & Electric Co. (KG&E)
P. O. Box 208
Wichita, Kansas 67201

Facility Name: Wolf Creek Generating Station (WCGS)

Inspection At: WCGS Site, Burlington, Kansas

Inspection Conducted: October 21-25, 1985

Inspector: H. Cherry
for R. E. Baer, Radiation Specialist, Facilities
Radiological Protection Section

12/3/85
Date

Approved: H. Cherry
for Blaine Murray, Chief, Facilities Radiological
Protection Section

12/3/85
Date

Inspection Summary

Inspection Conducted October 21-25, 1985 (Report 50-482/85-39)

Areas Inspected: Routine, unannounced inspection of the licensee's radioactive waste management controls, training and qualifications, quality assurance program, selection of packages, preparation for shipment, receipt, periodic maintenance, delivery to carrier, records and reports, solid radwaste, and low-level waste storage. The inspection involved 36 inspector-hours onsite by one NRC inspector.

Results: Within the areas inspected, no violations or deviations were identified.

8512180301 851205
PDR ADOCK 05000482
G PDR

DETAILS1. Persons ContactedKG&E

*F. T. Rhodes, Plant Manager
 *J. A. Bailey, Acting Site Director
 *J. L. Blackwell, Fire Protection Coordinator
 *G. D. Boyer, Technical Support Superintendent
 *W. G. Collins, Independent Safety Engineering Group
 *C. M. Estes, Operations Coordinator
 *A. A. Freitag, Manager, Nuclear Power Engineering (NPE)
 *J. C. Goode, Licensing
 *R. M. Grant, Director of Quality
 *N. W. Hoadley, Lead Engineer (NPE)
 *C. J. Hoch, Quality Assurances (QA) Technician
 *J. M. Isom, Health Physics (HP) Supervisory-Radwaste
 *J. A. Ives, Site Health Physicist
 *J. W. Johnson, Chief of Security
 *W. M. Lindsay, Supervisor, Quality Systems
 R. L. Logsdon, Site Chemist
 G. A. McClelland, QA Lead Auditor
 *T. S. Morrill, Chemistry Supervisory
 M. M. Nichols, Superintendent-Plant Support
 C. G. Patrick, Superintendent-Quality Evaluations
 *L. E. Paulson, Corporate Radwaste Engineer
 *G. Pendergrass, Licensing Engineer
 *K. R. Petersen, Lead Licensing Engineer
 R. J. Potter, Manager, Vendor Audits
 *W. J. Rudolph II, Manager, QA
 R. M. Stambaugh, QA Supervisor, Audits
 *P. E. Turner, Manager, Nuclear Training
 *M. G. Williams, Superintendent, Regulatory, Quality and Administration

Others

*W. D. Allen, Health Physics Consultant
 *B. L. Bartlett, NRC Resident Inspector
 *R. D. Flannigan, WCGS Site Representative KCPL
 *C. M. Herbst, Assistant Project Manager, Bechtel
 C. R. Rice, HP Operations Supervisor, Contractor
 C. C. Taylor, HP ALARA Coordinator, Contractor

*Denotes those individuals present during the exit meeting on October 25, 1985.

The NRC inspector also interviewed licensee and contractor employees including health physics, chemistry, and operations personnel.

2. Inspector Observations

The following are observations the NRC inspector called to the licensee's attention. These observations are neither violations nor unresolved items. These items were recommended for licensee consideration for program improvement, but they have no specific regulatory requirement. The licensee indicated that these items would be reviewed.

- Position descriptions had not been established for operations site Radwaste Coordinator and HP Supervisor-Radwaste including responsibilities, duties, authorities, and interfaces with other site organizations. See Paragraph 3 for additional details.
- The responsibility had not been defined for dry active waste compaction and allocation of manpower. See paragraph 3 for additional details.
- HPH-09 series procedures and ADM-03-007 and 008 need to be revised to reflect current assignment of duties to HP Supervisor-Radwaste. See paragraph 3 for additional details.
- Suppliers of certain transportation activities items had not been included on the qualified vendor list. See paragraph 5 for additional details.
- Approval had not been applied for use of certain shipping casks for the transport of radioactive materials. See paragraph 6 for additional details.
- A Quality Control Program had not been developed for transportation activities. See paragraph 7 for additional details.
- A procedure had not been developed for the radiological analysis and 10 CFR 61 correlation factor determination including sampling frequency. See paragraph 7 for additional details.
- A procedure had not been developed for the preparation of shipping manifest. See paragraph 8 for additional details.
- A procedure had not been developed which includes the advanced notification of the consignee for certain packages of radioactive materials. See paragraph 8 for additional details.

3. Organization and Management Controls

The NRC inspector examined the licensee's corporate and onsite organization regarding transportation activities for radioactive materials and solid radioactive waste management to determine compliance with the Final Safety Analysis Report (FSAR), Chapters 13.1 and 13.4 commitments, WCGS Technical Specifications (TS) Section 6.2.2 and 6.5 requirements, and Regulatory Guide (RG) 4.15, recommendations.

The licensee had proposed, approved, but had not implemented changes to the radioactive waste management organization. The position of Site Radwaste Coordinator would be responsible for the operation of liquid, gaseous, and solid waste process systems, reporting to the operations superintendent and the HP supervisor. Radwaste would be responsible for dry active waste segregation and the shipment of radioactive materials, reporting to the site health physicist. The licensee had not defined the responsibilities for such items as waste reduction programs and dry waste compaction activities with the dedication of manpower to implement that segment of the program.

The NRC inspector discussed with licensee representatives that procedures, such as ADM-03.007, 008, 950 and the HPH-09 series procedures, had been written identifying the Site Radwaste Coordinator reporting to the site health physicist and being responsible for all aspects of the Radwaste Program Management. The NRC inspector noted that these procedures should be revised to separate radwaste management from transportation activities.

The NRC inspector reviewed the site QA Program for radioactive waste management and transportation defined in procedure QAP-W18.6 "Audit System" Revision 1, August 7, 1985 Appendix A, and the Essential Elements Manual, Item 29, "Radioactive Waste Management and Transportation," which list the 12 essential elements and 51 attributes for the program. The NRC inspector noted that additional essential elements and attributes are contained in item 28, "Radiation Protection."

The NRC inspector had previously reviewed that last QA Audit Report TE 50140-K022 on "Radioactive Waste Management and Transportation Activities," and TE:50140-K052, "Radiation Protection" as documented in NRC Inspection Report 50-482/85-32.

The NRC inspector reviewed those procedures listed in Attachment 1 which had been issued or revised since the previous solid radioactive waste and transportation activities inspection. The NRC inspector discussed with licensee representatives those areas where improvements were needed.

No violations or deviations were identified.

4. Training and Qualifications

The NRC inspector reviewed the licensee's transportation activities training program and individual qualifications to determine compliance with WCGS FSAR commitments and TS Section 6.4 and 10 CFR Part 19.12 requirements.

The NRC inspector noted that the licensee utilizes a vendor to furnish specialized training regarding federal and burial site requirements for the transport of radioactive materials. The NRC inspector conducted interviews with several employees responsible for the shipment of radioactive materials and determined that most of the HP staff had received the specialized transportation activities training.

No violations or deviations were identified.

5. Quality Assurance Program

The NRC inspector reviewed the licensee's Quality Assurance Program to determine acceptance with 10 CFR Part 71, Subpart H.

The NRC inspector discussed with licensee representatives the status of the QA program submittal to the Office of Nuclear Material Safety and Safeguards, USNRC for approval. The licensee stated that a complete QA program was being written following the requirements set forth in 10 CFR Part 71, Subpart H. This QA program was expected to be ready for submittal and approval within sufficient time prior to the need to implement the program.

The NRC inspector discussed with licensee representatives the desirability to perform audits of various vendors supplying packaging containers to assure compliance with applicable regulatory requirements such as Department of Transportation (DOT) 17-H Drums-49 CFR 178.118 and DOT type 7A containers-49 CFR 173.465. The licensee indicated they would review those suppliers of shipping packaging and implement an audit function that would place these suppliers on the licensee's Corporate Qualified Vendor List.

No violations or deviations were identified.

6. Procurement and Selection of Packages

The NRC inspector reviewed the licensee's procurement of DOT and NRC certified packaging. The NRC inspector noted that the licensee had not made any shipment of radioactive material at the time of this inspection which required a DOT or NRC certified package. The licensee was noted to have available the appropriate controlled copies of documents on design, use, maintenance, testing and NRC/DOT certification, including letters of

user status for NRC approved casks, but the licensee had not filed an application to become a certified user of any of these casks.

The NRC inspector discussed with licensee representatives the need to have casks placed on the user's list prior to use. The licensee indicated they would apply for certification to use those casks on which they had supporting documentation.

No violations or deviations were identified.

7. Preparation of Packages for Shipment

The NRC inspector reviewed the licensee's procedures involving preparation of packages for shipment. The NRC inspector determined that the licensee had not developed checklists for routinely opening, inspecting, loading and closing of packages. The licensee had available those checklists which were vendor supplied for DOT/NRC certified packages.

The NRC inspector discussed with licensee representatives the necessity for a Quality Control (QC) Program to assure that packages are properly prepared for shipment. The NRC inspector noted that the QC Program should include checklists for opening, inspection (including gasket condition and placement), closing the packages (such as torquing of bolts), and package restraint requirements. The NRC inspector also discussed the need to comply with the DOT requirements set forth in 49 CFR for the specific container criteria such as 178.118-8 which requires that gaskets are in place for closure of the drum. The licensee stated they would review the regulatory requirements and develop a QC program checklist for packaging.

The NRC inspector reviewed the licensee's procedure HPH-09-501, for classification of the contents and procedure HPH-09-502 for determination of curie content in waste packages. The licensee had used AIF/NESP-027, "Methodologies for Classification of Low-Level Radioactive Waste From Nuclear Power Plants," for the basis to determine the scaling factors based on the cesium-137 and cobalt-60 concentrations in primary coolant samples. This has been an accepted practice for nuclear power plants coming on line.

The NRC inspector discussed with licensee representatives the proposed schedule for sampling of waste streams to determine radionuclide concentrations which actually exist at WCGS. The licensee had recently sent out a request for quotation, number WC-FDL-7-26, "Radiological Analysis and 10 CFR 61 Correlation Factor Determination." The licensee plans to obtain samples from the waste streams on approximately a quarterly frequency.

The NRC inspector noted that the licensee had not included in any station procedure the waste streams and sampling frequency that will be used for

radiological analysis and 10 CFR 61 correlation factor determination. The licensee stated they would include the required data in procedure ADM-04-020, "Chemistry Surveillance Procedures."

No violations or deviations were identified.

8. Delivery of Completed Packages To Carriers

The NRC inspector reviewed the licensee's procedures for delivery of completed packages to the carrier for transport to determine compliance with the requirements of 10 CFR Parts 20.311, 71.97, and 49 CFR Part 173.22.

The NRC inspector noted that the licensee had a computer generated shipping manifest, but did not have a procedure which addressed the implementation nor the required information necessary to complete the shipping manifest. The NRC inspector discussed with licensee representatives the desirability for a procedure. The licensee stated they would review the shipping manifest preparation program.

The NRC inspector noted that procedure HPH-09-531, "Advanced Notifications" addressed the notifications required to state authorities which certain packages would travel, but advance notification of the consignee was not addressed as required by 49 CFR Part 173.22(c). The NRC inspector discussed with licensee representatives the need to incorporate the advance notification to the consignee into their procedures. This licensee stated they would review the regulatory requirement and take appropriate action to include the consignee into their advanced notification procedures.

No violations or deviations were identified.

9. Receipt of Packages

The NRC inspector reviewed the licensee's procedures HPH-09-512, ADM-03-203 and ADM-02-001 to determine compliance with 10 CFR Part 20.205. The NRC inspector determined that the licensee's procedures adequately addressed the regulatory requirements for receipt of radioactive materials.

No violations or deviations were identified.

10. Periodic Maintenance of Packages

The NRC inspector determined the licensee does not perform maintenance on packages at this time. The licensee indicated that when NRC certified packages are used and maintenance other than gasket replacement is required, the vendor/supplier will be required to perform this maintenance.

No violations or deviations were identified.

11. Records and Reports

The NRC inspector reviewed the licensee's program of records and reports to determine compliance with the requirements of 10 CFR Parts 71.85, .87, .91, and .135.

The licensee had not made any shipments of radioactive materials at the time of this inspection. The NRC inspector determined that the licensee's procedure HPH-09-530, "Shipping Documents" and HPH-09-532, "Radwaste Reports" appear to contain sufficient information to implement the program.

No violations or deviations were identified.

12. Solid Radwaste

The NRC inspector reviewed the licensee's solid radwaste program for compliance with the requirement of 10 CFR Parts 20.311, 61.55 and 61.56.

The licensee had not solidified any radioactive liquids, spent resins, or evaporator concentrates at the time of this inspection. The licensee had packaged a small quantity of dry active waste comprised of trash and decontamination materials in 55 gallon drums.

No violations or deviations were identified.

13. Onsite Interim Low-Level Radioactive Waste Storage Facility

The NRC inspector reviewed the licensee's preparations for establishing an onsite low-level radioactive waste (LLRW) storage facility.

The licensee had completed designs for a structure that would be used to store LLRW in a ready for transport condition. The licensee indicated that construction of the facility was a year away.

No violations or deviations were identified.

14. Exit Interview

The NRC inspector met with licensee representatives identified in paragraph 1 and the NRC resident inspector at the conclusion of the inspection on October 25, 1985. The NRC inspector summarized the scope and findings of this inspection including those observations identified in paragraph 3 of this report. The licensee indicated they would review these matters.

ATTACHMENT 1

WCGS Procedures Reviewed

ADM-01-009, "Site Health Physicist Duties and Responsibilities," Revision 4, August 27, 1985.

ADM-01-032, "Semi-Annual Radioactive Effluent Release Report Instructions," Revision 1, October 28, 1985.

ADM-03-007, "Duties and Responsibilities for Health Physics Supervisors and Technicians," Revision 4, December 7, 1984.

ADM-03-008, "Site Radwaste Coordinator," Revision 0, August 25, 1984.

ADM-03-203, "Administrative Procedure for Radioactive Material," Revision 3, December 17, 1984.

ADM-03-950, "Radioactive Waste Program," Revision 0, August 27, 1984.

HPH-02-001, "Receipt, Accountability, Inventory and Leak Check of Radioactive Materials," Revision 4, March 26, 1985.

HPH-02-006, "Receipt of New Fuel," Revision 3, May 28, 1985.

HPH-09-501, "Classification of Waste," Revision 1, May 28, 1985.

HPH-09-502, "Curie Content Determination," Revision 1, May 28, 1985.

HPH-09-503, "Collection and Transfer of Radioactive Waste," Revision 2, September 12, 1985.

HPH-09-504, "Packaging of Compactible Solid Waste," Revision 1, May 3, 1985.

HPH-09-505, "Packaging of Noncompactible Solid Waste," Revision 1, May 3, 1985.

HPH-09-506, "Packaging of High Level Filters," Revision 1, July 8, 1985.

HPH-09-509, "Handling and Storage of Radwaste Containers," Revision 1, September 10, 1985.

HPH-09-510, "Handling of Low Level Filters," Revision 1, May 28, 1985.

HPH-09-511, "Use of Drum Inspection Facility," Revision 1, September 12, 1985.

HPH-09-512, "Incoming Vehicle Surveys," Revision 1, May 7, 1985.

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-482/85-39

Operating License: NPF-42

Docket: 50-482

Licensee: Kansas Gas & Electric Co. (KG&E)
P. O. Box 208
Wichita, Kansas 67201

Facility Name: Wolf Creek Generating Station (WCGS)

Inspection At: WCGS Site, Burlington, Kansas

Inspection Conducted: October 21-25, 1985

Inspector:

for H. Chung
R. E. Baer, Radiation Specialist, Facilities
Radiological Protection Section

12/3/85
Date

Approved:

for H. Chung
Blaine Murray, Chief, Facilities Radiological
Protection Section

12/3/85
Date

Inspection Summary

Inspection Conducted October 21-25, 1985 (Report 50-482/85-39)

Areas Inspected: Routine, unannounced inspection of the licensee's radioactive waste management controls, training and qualifications, quality assurance program, selection of packages, preparation for shipment, receipt, periodic maintenance, delivery to carrier, records and reports, solid radwaste, and low-level waste storage. The inspection involved 36 inspector-hours onsite by one NRC inspector.

Results: Within the areas inspected, no violations or deviations were identified.

DETAILS1. Persons ContactedKG&E

*F. T. Rhodes, Plant Manager
 *J. A. Bailey, Acting Site Director
 *J. L. Blackwell, Fire Protection Coordinator
 *G. D. Boyer, Technical Support Superintendent
 *W. G. Collins, Independent Safety Engineering Group
 *C. M. Estes, Operations Coordinator
 *A. A. Freitag, Manager, Nuclear Power Engineering (NPE)
 *J. C. Goode, Licensing
 *R. M. Grant, Director of Quality
 *N. W. Hoadley, Lead Engineer (NPE)
 *C. J. Hoch, Quality Assurances (QA) Technician
 *J. M. Isom, Health Physics (HP) Supervisory-Radwaste
 *J. A. Ives, Site Health Physicist
 *J. W. Johnson, Chief of Security
 *W. M. Lindsay, Supervisor, Quality Systems
 R. L. Logsdon, Site Chemist
 G. A. McClelland, QA Lead Auditor
 *T. S. Morrill, Chemistry Supervisory
 M. M. Nichols, Superintendent-Plant Support
 C. G. Patrick, Superintendent-Quality Evaluations
 *L. E. Paulson, Corporate Radwaste Engineer
 *G. Pendergrass, Licensing Engineer
 *K. R. Petersen, Lead Licensing Engineer
 R. J. Potter, Manager, Vendor Audits
 *W. J. Rudolph II, Manager, QA
 R. M. Stambaugh, QA Supervisor, Audits
 *P. E. Turner, Manager, Nuclear Training
 *M. G. Williams, Superintendent, Regulatory, Quality and Administration

Others

*W. D. Allen, Health Physics Consultant
 *B. L. Bartlett, NRC Resident Inspector
 *R. D. Flannigan, WCGS Site Representative KCPL
 *C. M. Herbst, Assistant Project Manager, Bechtel
 C. R. Rice, HP Operations Supervisor, Contractor
 C. C. Taylor, HP ALARA Coordinator, Contractor

*Denotes those individuals present during the exit meeting on October 25, 1985.

The NRC inspector also interviewed licensee and contractor employees including health physics, chemistry, and operations personnel.

2. Inspector Observations

The following are observations the NRC inspector called to the licensee's attention. These observations are neither violations nor unresolved items. These items were recommended for licensee consideration for program improvement, but they have no specific regulatory requirement. The licensee indicated that these items would be reviewed.

- Position descriptions had not been established for operations site Radwaste Coordinator and HP Supervisor-Radwaste including responsibilities, duties, authorities, and interfaces with other site organizations. See Paragraph 3 for additional details.
- The responsibility had not been defined for dry active waste compaction and allocation of manpower. See paragraph 3 for additional details.
- HPH-09 series procedures and ADM-03-007 and 008 need to be revised to reflect current assignment of duties to HP Supervisor-Radwaste. See paragraph 3 for additional details.
- Suppliers of certain transportation activities items had not been included on the qualified vendor list. See paragraph 5 for additional details.
- Approval had not been applied for use of certain shipping casks for the transport of radioactive materials. See paragraph 6 for additional details.
- A Quality Control Program had not been developed for transportation activities. See paragraph 7 for additional details.
- A procedure had not been developed for the radiological analysis and 10 CFR 61 correlation factor determination including sampling frequency. See paragraph 7 for additional details.
- A procedure had not been developed for the preparation of shipping manifest. See paragraph 8 for additional details.
- A procedure had not been developed which includes the advanced notification of the consignee for certain packages of radioactive materials. See paragraph 8 for additional details.

3. Organization and Management Controls

The NRC inspector examined the licensee's corporate and onsite organization regarding transportation activities for radioactive materials and solid radioactive waste management to determine compliance with the Final Safety Analysis Report (FSAR), Chapters 13.1 and 13.4 commitments, WCGS Technical Specifications (TS) Section 6.2.2 and 6.5 requirements, and Regulatory Guide (RG) 4.15, recommendations.

The licensee had proposed, approved, but had not implemented changes to the radioactive waste management organization. The position of Site Radwaste Coordinator would be responsible for the operation of liquid, gaseous, and solid waste process systems, reporting to the operations superintendent and the HP supervisor. Radwaste would be responsible for dry active waste segregation and the shipment of radioactive materials, reporting to the site health physicist. The licensee had not defined the responsibilities for such items as waste reduction programs and dry waste compaction activities with the dedication of manpower to implement that segment of the program.

The NRC inspector discussed with licensee representatives that procedures, such as ADM-03.007, 008, 950 and the HPH-09 series procedures, had been written identifying the Site Radwaste Coordinator reporting to the site health physicist and being responsible for all aspects of the Radwaste Program Management. The NRC inspector noted that these procedures should be revised to separate radwaste management from transportation activities.

The NRC inspector reviewed the site QA Program for radioactive waste management and transportation defined in procedure QAP-W18.6 "Audit System" Revision 1, August 7, 1985 Appendix A, and the Essential Elements Manual, Item 29, "Radioactive Waste Management and Transportation," which list the 12 essential elements and 51 attributes for the program. The NRC inspector noted that additional essential elements and attributes are contained in item 28, "Radiation Protection."

The NRC inspector had previously reviewed that last QA Audit Report TE 50140-K022 on "Radioactive Waste Management and Transportation Activities," and TE:50140-K052, "Radiation Protection" as documented in NRC Inspection Report 50-482/85-32.

The NRC inspector reviewed those procedures listed in Attachment 1 which had been issued or revised since the previous solid radioactive waste and transportation activities inspection. The NRC inspector discussed with licensee representatives those areas where improvements were needed.

No violations or deviations were identified.

4. Training and Qualifications

The NRC inspector reviewed the licensee's transportation activities training program and individual qualifications to determine compliance with WCGS FSAR commitments and TS Section 6.4 and 10 CFR Part 19.12 requirements.

The NRC inspector noted that the licensee utilizes a vendor to furnish specialized training regarding federal and burial site requirements for the transport of radioactive materials. The NRC inspector conducted interviews with several employees responsible for the shipment of radioactive materials and determined that most of the HP staff had received the specialized transportation activities training.

No violations or deviations were identified.

5. Quality Assurance Program

The NRC inspector reviewed the licensee's Quality Assurance Program to determine acceptance with 10 CFR Part 71, Subpart H.

The NRC inspector discussed with licensee representatives the status of the QA program submittal to the Office of Nuclear Material Safety and Safeguards, USNRC for approval. The licensee stated that a complete QA program was being written following the requirements set forth in 10 CFR Part 71, Subpart H. This QA program was expected to be ready for submittal and approval within sufficient time prior to the need to implement the program.

The NRC inspector discussed with licensee representatives the desirability to perform audits of various vendors supplying packaging containers to assure compliance with applicable regulatory requirements such as Department of Transportation (DOT) 17-H Drums-49 CFR 178.118 and DOT type 7A containers-49 CFR 173.465. The licensee indicated they would review those suppliers of shipping packaging and implement an audit function that would place these suppliers on the licensee's Corporate Qualified Vendor List.

No violations or deviations were identified.

6. Procurement and Selection of Packages

The NRC inspector reviewed the licensee's procurement of DOT and NRC certified packaging. The NRC inspector noted that the licensee had not made any shipment of radioactive material at the time of this inspection which required a DOT or NRC certified package. The licensee was noted to have available the appropriate controlled copies of documents on design, use, maintenance, testing and NRC/DOT certification, including letters of

user status for NRC approved casks, but the licensee had not filed an application to become a certified user of any of these casks.

The NRC inspector discussed with licensee representatives the need to have casks placed on the user's list prior to use. The licensee indicated they would apply for certification to use those casks on which they had supporting documentation.

No violations or deviations were identified.

7. Preparation of Packages for Shipment

The NRC inspector reviewed the licensee's procedures involving preparation of packages for shipment. The NRC inspector determined that the licensee had not developed checklists for routinely opening, inspecting, loading and closing of packages. The licensee had available those checklists which were vendor supplied for DOT/NRC certified packages.

The NRC inspector discussed with licensee representatives the necessity for a Quality Control (QC) Program to assure that packages are properly prepared for shipment. The NRC inspector noted that the QC Program should include checklists for opening, inspection (including gasket condition and placement), closing the packages (such as torquing of bolts), and package restraint requirements. The NRC inspector also discussed the need to comply with the DOT requirements set forth in 49 CFR for the specific container criteria such as 178.118-8 which requires that gaskets are in place for closure of the drum. The licensee stated they would review the regulatory requirements and develop a QC program checklist for packaging.

The NRC inspector reviewed the licensee's procedure HPH-09-501, for classification of the contents and procedure HPH-09-502 for determination of curie content in waste packages. The licensee had used AIF/NESP-027, "Methodologies for Classification of Low-Level Radioactive Waste From Nuclear Power Plants," for the basis to determine the scaling factors based on the cesium-137 and cobalt-60 concentrations in primary coolant samples. This has been an accepted practice for nuclear power plants coming on line.

The NRC inspector discussed with licensee representatives the proposed schedule for sampling of waste streams to determine radionuclide concentrations which actually exist at WCGS. The licensee had recently sent out a request for quotation, number WC-FDL-7-26, "Radiological Analysis and 10 CFR 61 Correlation Factor Determination." The licensee plans to obtain samples from the waste streams on approximately a quarterly frequency.

The NRC inspector noted that the licensee had not included in any station procedure the waste streams and sampling frequency that will be used for

radiological analysis and 10 CFR 61 correlation factor determination. The licensee stated they would include the required data in procedure ADM-04-020, "Chemistry Surveillance Procedures."

No violations or deviations were identified.

8. Delivery of Completed Packages To Carriers

The NRC inspector reviewed the licensee's procedures for delivery of completed packages to the carrier for transport to determine compliance with the requirements of 10 CFR Parts 20.311, 71.97, and 49 CFR Part 173.22.

The NRC inspector noted that the licensee had a computer generated shipping manifest, but did not have a procedure which addressed the implementation nor the required information necessary to complete the shipping manifest. The NRC inspector discussed with licensee representatives the desirability for a procedure. The licensee stated they would review the shipping manifest preparation program.

The NRC inspector noted that procedure HPH-09-531, "Advanced Notifications" addressed the notifications required to state authorities which certain packages would travel, but advance notification of the consignee was not addressed as required by 49 CFR Part 173.22(c). The NRC inspector discussed with licensee representatives the need to incorporate the advance notification to the consignee into their procedures. This licensee stated they would review the regulatory requirement and take appropriate action to include the consignee into their advanced notification procedures.

No violations or deviations were identified.

9. Receipt of Packages

The NRC inspector reviewed the licensee's procedures HPH-09-512, ADM-03-203 and ADM-02-001 to determine compliance with 10 CFR Part 20.205. The NRC inspector determined that the licensee's procedures adequately addressed the regulatory requirements for receipt of radioactive materials.

No violations or deviations were identified.

10. Periodic Maintenance of Packages

The NRC inspector determined the licensee does not perform maintenance on packages at this time. The licensee indicated that when NRC certified packages are used and maintenance other than gasket replacement is required, the vendor/supplier will be required to perform this maintenance.

No violations or deviations were identified.

11. Records and Reports

The NRC inspector reviewed the licensee's program of records and reports to determine compliance with the requirements of 10 CFR Parts-71.85, .87, .91, and .135.

The licensee had not made any shipments of radioactive materials at the time of this inspection. The NRC inspector determined that the licensee's procedure HPH-09-530, "Shipping Documents" and HPH-09-532, "Radwaste Reports" appear to contain sufficient information to implement the program.

No violations or deviations were identified.

12. Solid Radwaste

The NRC inspector reviewed the licensee's solid radwaste program for compliance with the requirement of 10 CFR Parts 20.311, 61.55 and 61.56.

The licensee had not solidified any radioactive liquids, spent resins, or evaporator concentrates at the time of this inspection. The licensee had packaged a small quantity of dry active waste comprised of trash and decontamination materials in 55 gallon drums.

No violations or deviations were identified.

13. Onsite Interim Low-Level Radioactive Waste Storage Facility

The NRC inspector reviewed the licensee's preparations for establishing an onsite low-level radioactive waste (LLRW) storage facility.

The licensee had completed designs for a structure that would be used to store LLRW in a ready for transport condition. The licensee indicated that construction of the facility was a year away.

No violations or deviations were identified.

14. Exit Interview

The NRC inspector met with licensee representatives identified in paragraph 1 and the NRC resident inspector at the conclusion of the inspection on October 25, 1985. The NRC inspector summarized the scope and findings of this inspection including those observations identified in paragraph 3 of this report. The licensee indicated they would review these matters.

ATTACHMENT 1

WCGS Procedures Reviewed

- ADM-01-009, "Site Health Physicist Duties and Responsibilities," Revision 4, August 27, 1985.
- ADM-01-032, "Semi-Annual Radioactive Effluent Release Report Instructions," Revision 1, October 28, 1985.
- ADM-03-007, "Duties and Responsibilities for Health Physics Supervisors and Technicians," Revision 4, December 7, 1984.
- ADM-03-008, "Site Radwaste Coordinator," Revision 0, August 25, 1984.
- ADM-03-203, "Administrative Procedure for Radioactive Material," Revision 3, December 17, 1984.
- ADM-03-950, "Radioactive Waste Program," Revision 0, August 27, 1984.
- HPH-02-001, "Receipt, Accountability, Inventory and Leak Check of Radioactive Materials," Revision 4, March 26, 1985.
- HPH-02-006, "Receipt of New Fuel," Revision 3, May 28, 1985.
- HPH-09-501, "Classification of Waste," Revision 1, May 28, 1985.
- HPH-09-502, "Curie Content Determination," Revision 1, May 28, 1985.
- HPH-09-503, "Collection and Transfer of Radioactive Waste," Revision 2, September 12, 1985.
- HPH-09-504, "Packaging of Compactible Solid Waste," Revision 1, May 3, 1985.
- HPH-09-505, "Packaging of Noncompactible Solid Waste," Revision 1, May 3, 1985.
- HPH-09-506, "Packaging of High Level Filters," Revision 1, July 8, 1985.
- HPH-09-509, "Handling and Storage of Radwaste Containers," Revision 1, September 10, 1985.
- HPH-09-510, "Handling of Low Level Filters," Revision 1, May 28, 1985.
- HPH-09-511, "Use of Drum Inspection Facility," Revision 1, September 12, 1985.
- HPH-09-512, "Incoming Vehicle Surveys," Revision 1, May 7, 1985.

