

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D. C. 20555

February 3, 1987

IE INFORMATION NOTICE NO: 87-07: QUALITY CONTROL OF ONSITE DEWATERING/
SOLIDIFICATION OPERATIONS BY OUTSIDE
CONTRACTORS

Addressees:

All nuclear power reactor facilities holding an operating license (OL) or construction permit (CP).

Purpose:

This notice is intended to remind licensees of their responsibility to ensure that appropriate quality control measures are carried out during the operation performed by outside contractors of transportable dewatering and/or solidification radwaste processing equipment at the site of a licensed facility. It is suggested that recipients review the information for applicability to their facilities. No written response is required.

Related Documents:

NRC IE Information Notice No, 79-09, "Spill of Radioactively Contaminated Resin," March 30, 1979. This notice reminded licensees of their responsibility to review the adequacy of the equipment and procedures used by such outside contractors.

NRC IE Circular 80-18, "10 CFR 50.59 Safety Evaluation for Changes to Radioactive Waste Treatment Systems," August 22, 1980. This circular pointed out that in some instances, licensees have failed to perform adequate safety evaluations to support changes to solidification/dewatering systems operated by an outside contractor at a licensee's facility, so as to determine that there are no unresolved safety issues.

Background:

The functions performed by mobile transportable radwaste processing equipment for solidification or dewatering (e.g., usually skid mounted or truck mounted) are very often performed by outside contractor personnel. Such operations fall within the scope of the operating reactor's license issued pursuant to 10 CFR 50. Therefore, regardless of the specific method of processing the waste or the contractor involved, the licensee is responsible for ensuring that all such activities on his site are carried out in a manner consistent with the facility operating license and applicable technical specifications, process control program and regulations, in a manner that provides adequate protection from the health, safety, and environmental standpoints.

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A very important and somewhat recent regulatory requirement relating to such operations is found in 10 CFR 20.311(d)(3), which requires that a licensee shall "....conduct a quality control program to assure compliance with §§61.55 and 61.56 of this chapter; the program must include management evaluation of audits."

Description of Circumstances:

Several recent NRC inspections have revealed inadequacies in quality control programs during such operations. A typical result of these inadequacies is the failure to reduce the water content of solidified wastes or dewatered resins to the applicable limits; for example, either 0.5% by volume of the stable waste form or 1% by volume of the waste when placed in a disposal container, a "High Integrity Container" which is designed to ensure stability. This has resulted in enforcement actions and/or civil penalties against the shipper/licensee by the burial site state licensing authority. In some instances, it has been observed that no quality control program is in place by either the contractor or the licensee. Typically, the contractor might perform the solidification/dewatering without any holdpoints or quality control check points by either the licensee or the contractor, especially a control check that is independent of the operator of the waste processing equipment. It has also been found that in some cases, quality assurance audits have neither been performed nor have the results of such audits, when performed by contractor personnel, been reviewed by licensee management.

Discussion:

The operations conducted at a licensee facility by an outside vendor are usually addressed in the licensee's process control program, which is an incorporated requirement of the applicable Technical Specification. It is incumbent on the licensee to exercise oversight and control of all aspects of the contractor's operation. This includes review of sample results, test solidification results, product verifications, and quality control audits. Licensee controls must be adequate to ensure compliance with the requirements of 10 CFR 20.311 and 10 CFR 61.56.

It is expected that licensees will review the information provided for applicability, if appropriate, to their waste management programs. However, suggestions contained in this notice do not constitute NRC requirements; therefore, no specific action or written response is required.

If you have questions regarding this matter, please contact the Regional Administrator of the appropriate NRC regional office or this office.

Edward L. Jordan, Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

Technical Contact: A. W. Grella, IE
(301) 492-7746

Attachments:
List of Recently Issued IE Information Notices

(* See previous concurrence)

OFC	: PSAS: IE*	: SMPB: IE*	: C: SMPB: IE*	: DD: DI: IE*	: D: DI: IE*	: DD: DEPER: IE*	: D: DEPER
NAME	: DGable	: AGrella	: GSjoblom	: RSpessard	: JPartlow	: SSchwartz	: EJordan
DATE	: 11/24/86sjr	: 11/20/86	: 11/ /86	: 12/ /86	: 12/ /86	: 12/ /86	: 1/27/87

1/20/87

After revisions requested by E. Jordan on 1/18/87

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LIST OF RECENTLY ISSUED
 IE INFORMATION NOTICES

Information Notice No.	Subject	Date of Issue	Issued to
87-06	Loss of Suction to Low-Pressure Service Water System Pumps Resulting From Loss of Siphon	1/30/87	All power reactor facilities holding an OL or CP
87-05	Miswiring in a Westinghouse Rod Control System	2/2/87	All Westinghouse power reactor facilities holding an OL or CP
87-04	Diesel Generator Fails Test Because of Degraded Fuel	1/16/87	All power reactor facilities holding an OL or CP
87-03	Segregation of Hazardous	1/15/87	All NRC licensees
87-02	Inadequate Seismic Qualification of Diaphragm Valves by Mathematical Modeling and Analysis	1/15/87	All power reactor facilities holding an OL or CP
87-01	RHR Valve Misalignment Causes Degradation of ECCS in PWRs	1/6/87	All PWR facilities holding an OL or CP
86-110	Anomalous Behavior of Recirculation Loop Flow in Jet Pump BWR Plants	12/31/86	All BWR facilities holding an OL or CP
86-109	Diaphragm Failure In Scram Outlet Valve Causing Rod Insertion	12/29/86	All BWR facilities holding an OL or CP
86-108	Degradation Of Reactor Coolant System Pressure Boundary Resulting From Boric Acid Corrosion	12/29/86	All PWR facilities holding an OL or CP
86-107	Entry Into PWR Cavity With Retractable Incore Detector Thimbles Withdrawn	12/29/86	All power reactor facilities holding an OL or CP

OL = Operating License
 CP = Construction Permit

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 and Engineering Response
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Attachments:

1. Applicability of Licensing and Regulatory Requirements to the Mobile Radioactive Waste Service Industry
2. List of Recently Issued IE Information Notices

(* See previous concurrence)

OFC	: PSAS: IE*	: SMPB: IE	: C: SMPB: IE	: DD: DI: IE	: D: DI: IE	: DD: DEPER: IE	: D: DEPER
NAME	: DGable	: AGrella	: GS Jordan	: RSpessard	: JPartlow	: SSchwartz	: EJordan
DATE	: 11/24/86sjr	: 11/24/86	: 11/28/86	: 12/1/86	: 12/1/86	: 12/12/86	: 12/ /86

1/20/87

2000 comments

returned 1/21/87 for review