

November 20, 1981

Eldon J. Brunner, Chief
Project Branch #1
Division of Resident and Project Inspection
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Re: Docket No. 50-220
Inspection Report No. 50-220/81-10

Dear Mr. Brunner:

This refers to the routine, safety inspection conducted by Mr. Baer of this office on April 28-May 1, 1981, at Nine Mile Point, Unit #1, Scriba, New York, of activities authorized by NRC License No. DPR-63.

ITEM A

10 CFR 71.51(a) states: The licensee shall establish, maintain and execute a Quality Assurance Program satisfying each of the applicable criteria specified in Appendix E to this part, ... Appendix E, Criterion 18, Audits, states: "A comprehensive systems of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program. The audits shall be performed in accordance with the written procedures or checklist by appropriately trained personnel not having direct responsibility in the areas being audited. Audit results shall be documented and reviewed by management having responsibility in the area audited. Followup action, including re-audit of deficient areas, shall be taken where indicated."

1. Contrary to the above, the four audits conducted of the radioactive waste management program in 1979 (audits 79-026A, 79-026B, 79-026C and 79-035) did not verify compliance with all aspects of the quality assurance program, in that, personnel training requirements were not audited.

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RESPONSE

Niagara Mohawk is committed to audit all Radiation Waste Shipment Procedures and Training records for station assigned personnel involved in Radiation Waste Shipment preparation at least once per year.

Training requirements were incorporated into all applicable surveillance checklists by 6/2/81, therefore, full compliance was achieved as of this date. Additionally, annual audits of the radioactive waste management program were completed 9/25/81.

ITEM A (Continued)

2. Contrary to the above, audit 79-026A identified three deficient areas in the radioactive waste management program, but no re-audits of the deficient areas were made between 9/27/79 and 5/1/81.

RESPONSE

Upon review of station records, a follow-up of audit 79-026A was documented on July 3, 1980. This follow-up covered the three deficient areas. Full compliance has been achieved.

ITEM B

10 CFR Part 20.205(d) states, "Each licensee shall establish and maintain procedures for safely opening packages in which licensed material is received, and shall assure that such procedures are followed and that due consideration is given to special instructions for the type of package being opened."

Contrary to the above, the licensee failed to establish and maintain procedures for the receipt, surveying and safe opening of packages containing radioactive material.

RESPONSE

A procedure for Picking Up, Receiving, and Opening Packages Containing Radioactive Materials (Procedure RP-4) was approved 5/28/81. This procedure meets the requirements of 10 CFR 20-205. Full compliance was achieved 5/28/81.

Sincerely,

Thomas E. Lempges
Thomas E. Lempges
Vice President
Nuclear Generation

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