

NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK300 ERIE BOULEVARD WEST
SYRACUSE, N.Y. 13202

September 19, 1986

THOMAS E. LEMPGES
VICE PRESIDENT—NUCLEAR GENERATION

Dr. Thomas E. Murley
Regional Administrator
United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King Of Prussia, PA 19406

Subject: Response to Inspection Report No. 50-220/86-15

Dear Sir:

Niagara Mohawk herein submits a response to the violation described in NRC Inspection 86-15 conducted at the Nine Mile Point Unit I facility on July 28 thru August 1, 1986.

This refers to a notice of violation contained in your Inspection Report 50-220/86-15 relating to the omission of Iron 55 on shipping documents (failure to indicate the radionuclide identity, quantity, and total activity on waste manifests).

Notice Of Violation Item A (50-220/86-15)

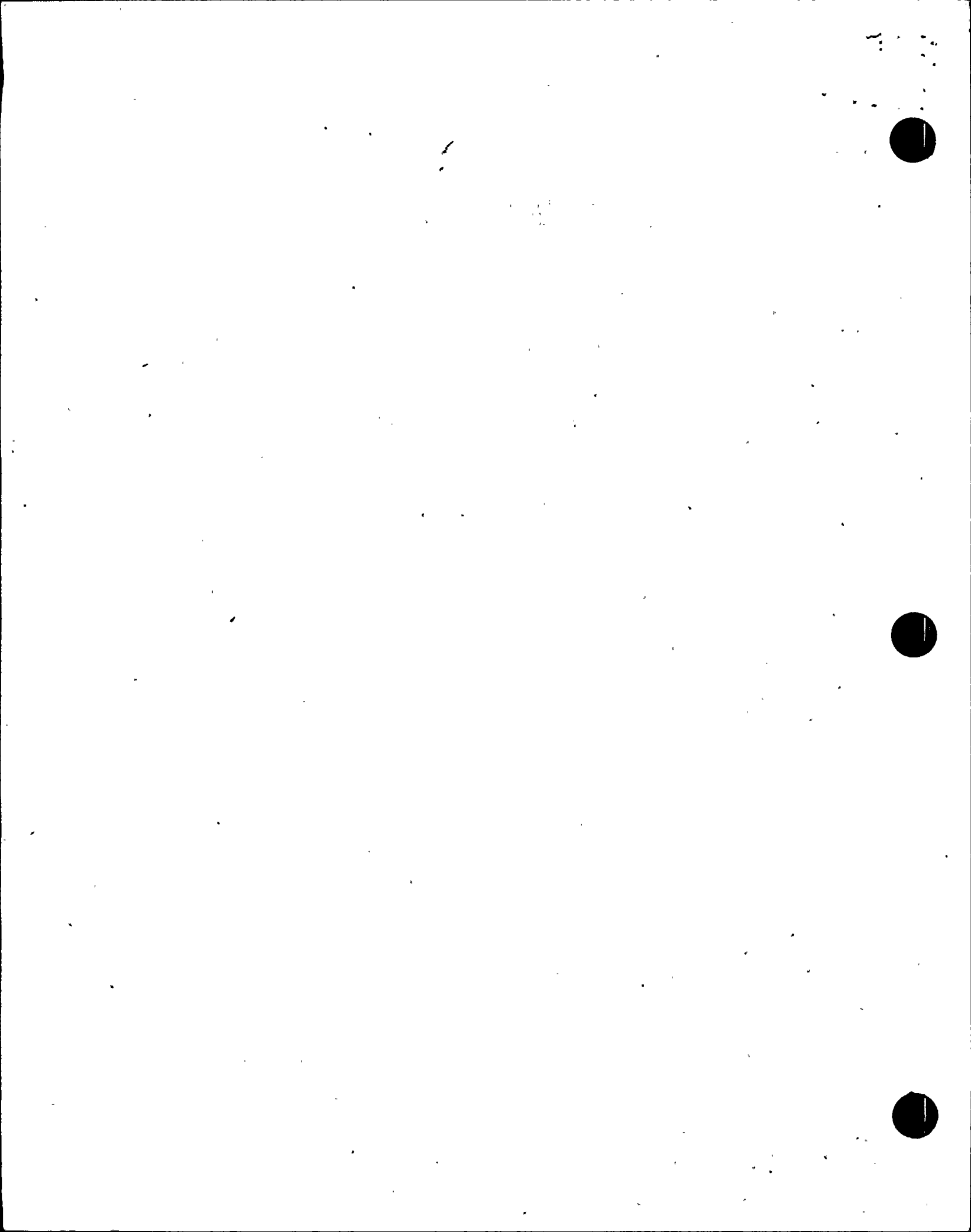
The Inspection Report states:

10 CFR 20.311(b) requires, in part, that the manifest accompanying radioactive waste shipments indicate as completely as practicable the radionuclide identity and quantity, and the total radioactivity of the shipment.

49 CFR 172.203(d), "Additional description requirements" also requires that the name of each radionuclide in the radioactive material must be included on the shipping papers.

Contrary to the above, during the period of February 19, 1985 through April 21, 1986, the licensee failed to identify the radionuclide Iron-55, its activity, and by the omission of Iron-55, the total radioactivity on the manifests for at least ten radioactive waste shipments made during the stated period. Iron-55 may have represented up to 35% of the total activity contained in any shipment made during the stated period.

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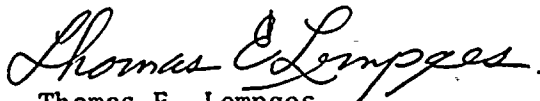
RESPONSE:

As a result of this inspection, Niagara Mohawk Power Corporation (NMPC) has implemented the following actions concerning waste sample analysis and waste shipment manifest reporting to ensure the site program complies with 10 CFR 20.311 and 49 CFR 172.203 as well as 10 CFR 61.

1. First Quarter 1986 waste sample composites have been reanalyzed specifically for Fe-55 content and appropriate Fe-55 scaling factors have been established.
2. Nine Mile Point Unit I (NMP1) procedure N1-CSP-14V, "Collection and Analysis of Waste Samples" has been revised to provide scaling factors for Fe-55, and other significant isotopes. Nine Mile Point Unit II (NMP2) procedure N2-CSP-14 will be similarly revised.
3. Split composite waste samples are presently being analyzed for Fe-55 and other isotopes which could contribute greater than 1% of the total sample activity in accordance with 10 CFR 20.311 and letter from T. Charlton (OHMR) to P. Tuite, Waste Management Group, Inc. dated 3/25/83.
4. The state of South Carolina has been verbally notified about the Fe-55 problem. Furthermore, a letter has been sent to Chem Nuclear Systems in Barnwell, South Carolina which provides corrected waste shipment curie quantities for the period 6/84 to 7/86 inclusive.
5. Purchase Requisitions to vendors who perform waste sample analysis for NMP1 and NMP2 have been revised to require analysis in accordance with 10 CFR 61 and 10 CFR 20.311. Specifically, identification of isotopes with concentrations greater than 1% will be provided.

The actions taken at NMP1 adequately address the concerns of report No. 50-220/86-15. The program for NMP2 will implement similar changes prior to initial waste shipments. In light of the above, no further action is planned by NMPC.

Sincerely,



Thomas E. Lempges
Vice President
Nuclear Generation

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