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SUBJECT: Responds to NRC ltr re violations noted in Insp Repts
 50-387/90-16 & 50-388/90-16.

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OCT 17 1990

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SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO NOTICE OF VIOLATION
(387/90-16-01; 388/90-16-01)
PLA-3460 FILE R41-1C/R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Bellamy:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/90-16 and 50-388/90-16, dated September 7, 1990.

The notice required submittal of a written reply within thirty (30) days of the date of the letter. However, as discussed with Dr. R.J. Bores of NRC Region I on September 20, 1990, PP&L has been authorized to delay the response until October 18, 1990 due to a delay in the receipt of the Inspection Report. We trust that the commission will find the attached response acceptable.

Very truly yours,

H. W. Keiser

cc: NRC Document Control Desk (original)
NRC Region I
Mr. M. C. Thadani, NRC Project Manager
Mr. G. Scott Barber, NRC Sr. Resident Inspector - SSES

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RESPONSE TO NOTICE OF VIOLATION

VIOLATION (387/90-16-01;388/90-16-01)

10CFR61.55(a)(8) states in part that "... the concentration of a radionuclide may be determined by indirect methods such as the use of scaling factors ... if there is reasonable assurance that the indirect methods can be correlated with actual methods ..."

Contrary to the above, since 1984 the licensee has been sampling and analyzing spent resin waste streams in a slurry form, while shipping these resins to a low-level radioactive waste disposal site in a dewatered form. As a result, the activity levels for most isotopes in these shipments were under reported. Additionally, a shipment of spent reactor water clean-up resins made in August, 1989, contained a mixture of two resins, for which the licensee had developed scaling factors for only one of the resin types.

RESPONSE

1. Corrective Steps Which Have Been Taken and the Results Achieved:

- a) Upon identification by PP&L, all shipments of radioactive waste were placed on hold. All waste streams were reviewed to ensure that samples were taken, prepared and analyzed such that the results were representative of the final waste.

RWCU filter media was the only waste stream where a sampling error was identified. The sampling and analysis of the other waste streams was found to be acceptable.

- b) Procedures were developed and/or revised to address the sampling requirements, sampling method, sample preparation and sample analysis for the RWCU Filter Media.
- c) Another sample was taken from RWCU Filter Media liner #90-17 (liner where sampling error was identified) and reanalyzed after proper sample preparations (sample dewatered prior to analysis). In addition, the scaling factors for this waste stream were also updated using dewatered samples. The update determined the impact of a new resin type on the scaling factors. Results of the second dewatering sample and the updated scaling factors were used to prepare the final shipping papers for that liner. The liner was properly manifested, shipped and disposed of in early September.



- d) Historical shipments of the RWCU Filter Media waste stream were evaluated to determine the potential for mischaracterization (Class, Type and LSA) due to the under reported activity levels. No mischaracterizations were identified.

2. Corrective Steps Which Will Be Taken to Avoid Further Violations:

- a) To ensure such an error does not occur in another waste stream the sampling program for waste streams will be proceduralized to address the sampling requirements, sampling method, sample preparation and sample analysis. Until the procedure summary for a particular waste stream is approved for shipment by the Plant Operating Review Committee (PORC), no shipments of that waste stream will be made.
- b) Proper correlation factors for the RWCU Filter Media waste stream will be verified prior to each shipment of this waste stream.
- c) As further enhancements to our program, validation methods to assure acceptability of the sample results will be developed. This validation will include utilizing historical data trending and container dose rates. (Estimated Completion Date 6/01/91)
- d) In addition, evaluation methods to determine the impacts of process and operational changes on waste streams including reanalysis for correlation factor changes as necessary will be developed. (Estimated Completion Date 6/01/91)

3. Date of Full Compliance

Based on (1) above PP&L is in full compliance.

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