

December 22, 1994

Mr. Robert G. Byram
Senior Vice President - Nuclear
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

SUBJECT: COMBINED INSPECTION NOS. 50-387/94-24 and 50-388/94-25 AND NOTICE
OF VIOLATION

Dear Mr. Byram:

An announced safety inspection of your radioactive waste management and radioactive waste/material shipping programs was conducted on site by Messrs. R. Ragland and L. Eckert on October 31 - November 4, 1994, of activities authorized by NRC License Nos. NPF-14 and NPF-22. At the conclusion of the inspection on November 4, 1994, Mr. Ragland discussed the findings of the inspection with Mr. G. Kuczynski and other members of your staff.

Areas examined during this inspection are important to health and safety and are described in the NRC Region I Inspection Report that is enclosed with this letter. The inspection was conducted to review solid radwaste management, transportation of radioactive material, and management of low-level radwaste storage facilities. Special emphasis was placed on audits and appraisals; changes to organization, personnel, and facilities; training and qualifications of personnel; implementation of the solid radwaste program; characterization and classification of wastes; shipping for disposal and transportation of other materials; safety reviews for the low-level radwaste holding facility (LLRWHF); start-up and operations of the LLRWHF; and effluent monitoring. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

Results of the inspection revealed overall good performance. This included effective implementation of the solid radwaste management and transportation of radioactive material program and effective management of the low level radwaste holding facility. The system for performing audits and surveillances, identifying deficiencies, and communicating findings, resulting in corrective actions was good. However, a concern was identified as to whether past corrective actions were sufficiently broad scope to prevent recurrence. This issue merits continuing attention to assure audit findings are addressed in a generic manner. With respect to personnel changes, inspection results revealed that significant changes were made within the Effluents Management organization, and that these changes were accomplished without a degradation in performance; this was noted as commendable. Good performance was also noted with the implementation of the solid radwaste program, characterization and classification of wastes, and shipping for disposal as well as transportation of radioactive materials. In addition, supporting calculations for the LLRWHF safety review were excellent, and general operation of the LLRWHF was noted as very good.

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2

In the area of training and qualifications, a weaknesses was identified with respect to hazardous materials training for Radwaste Shipping technicians and Quality Assurance personnel. Training for some of these individuals was not current. Although these individuals are not responsible for certifying the adequacy of radwaste shipments, Radwaste Shipping technicians are responsible for preparing radwaste and radioactive material shipments while under supervision, and Quality Assurance personnel are responsible for overseeing various phases involved with the preparation of radioactive material shipments.

In addition, although no corresponding performance degradation was noted, it appears that certain activities were not conducted in full compliance with NRC requirements, as described in the enclosed Region I Inspection Report and as set forth in the enclosed Notice of Violation (Notice). The apparent violation involved a failure to provide certification that individuals responsible for certifying the adequacy of radioactive material shipments had received proper training.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. The responses directed by this letter and the enclosed Notice of Violation are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, and the enclosed Notice of Violation and NRC Region I Inspection Report, will be placed in the NRC's public document room.

Your cooperation with us in this matter is appreciated.

Sincerely,
Original Signed By:
James H. Joyner

James H. Joyner, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety
and Safeguards

Docket Nos. 50-387; 50-388

Enclosure:

1. Notice of Violation
2. Combined Inspection Report Nos. 50-387/94-24 and 50-388/94-25



Robert G. Byram

3

cc w/encl:

H. G. Stanley, Vice President - Nuclear Operations

J. M. Kenny, Nuclear Licensing

G. T. Jones, Vice President - Nuclear Engineering

M. M. Urioste, Nuclear Services Manager

J. M. Finnegan, Supervisor, Nuclear Compliance

H. D. Woodshick, Special Office of the President

J. C. Tilton, III, Allegheny Electric Cooperative, Inc.
Commonwealth of Pennsylvania

D. Ney, Pennsylvania Department of Environmental Resources (PADER)

Robert G. Byram

4

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NAME	R. Ragland <i>RCR</i>		L. Eckert <i>LLE</i>		R. Bores <i>RLN</i>		J. Joyner		JANG <i>Not Approved</i>
DATE	12/20/94		12/20/94		12/21/94		12/22/94		12/19/94

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SECTION 4.1

*Not Approved
RCR
12/21/94*

