Public Service Electric and Gas Company

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March 22, 1988 NLR-N88047

United States Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Gentlemen:

RESPONSE TO NOTICE OF VIOLATION
NRC COMBINED INSPECTION REPORT 50-272/88-04 & 50-311/88-04
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

Public Service Electric and Gas Company (PSE&G) has received the subject inspection report dated February 22, 1988, which included a Notice of Violation regarding the failure to adequately survey the cab area of a exclusive-use vehicle used in shipping solid radwaste. Pursuant to the requirements of 10 CFR 2.201, our response to this Notice of Violation is provided in the attachment to this letter.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

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Attachment

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C Mr. D. C. Fischer USNRC Licensing Project Manager

Mr. T. J. Kenny USNRC Senior Resident Inspector

Mr. W. T. Russell, Administrator USNRC Region I

Mr. D. M. Scott, Chief Bureau of Nuclear Engineering Department of Environmental Protection 380 Scotch Road Trenton, NJ 08628

ATTACHMENT

Your letter dated February 22, 1988 transmitted a Notice of Violation (50-272/88-04-01 and 50-311/88-04-01) concerning radiation levels in excess of 10 CFR 71.47(d) limits. The violation involved radiation levels of between 3.0 and 4.5 millirem per hour in the sleeper portion of the truck cab of an exclusive-use vehicle used to transport radioactive waste for burial. Prior to shipment, a survey of the cab area had been performed in accordance with the Radioactive Waste Shipping Procedure. However, the procedure did not specify exact locations. Consequently, the sleeper portion of the cab was not adequately surveyed.

RESPONSE:

- 1. PUBLIC SERVICE ELECTRIC AND GAS COMPANY DOES NOT DISPUTE THIS VIOLATION.
- 2. THE ROOT CAUSE OF THE VIOLATION WAS FAILURE OF THE PROCEDURE TO CLEARLY ADDRESS SPECIFIC LOCATIONS IN THE SURVEY PROCEDURE.
- 3. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:
 - 1. The incident was reviewed with all appropriate Radiation Protection personnel, reinforcing the importance of thorough radioactive shipment surveys.
 - 2. The Radioactive Waste Shipment Procedure has been revised to more clearly define the specific survey locations to be used when surveying the truck cab. This includes a requirement to measure dose rates at the rear exterior of the cab for tractor-trailer shipments.
 - 3. The Radioactive Waste Shipment Procedure has been revised to include a step reinforcing the allowable radiation levels and the specific survey locations.
- 4. FULL COMPLIANCE HAS BEEN ACHIEVED

The revised procedure is presently in use. The changes to the procedure should ensure that all future surveys are adequately performed, thus preventing future violations.