U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
REGION IV

IE Inspection Report Nos. 50-313/79-24
50-368/79-23

Docket Nos. 50-313
50-368

Licensee: Arkansas Power and Light Company (AP&L)
P. O. Box 551
Russellville, Arkansas 72203

Facility: Arkansas Nuclear One

Location: Russellville, Arkansas

Inspection Date: November 9, 1979

Inspector: Harry C Harrison 1/16/80
H. C. Harrison, Radiation Specialist Date

Approved by: Glen D. Brown 1/16/80
Glen D. Brown, Chief, Fuel Facility and Material Safety Branch, Region IV Date

Inspection Summary

Inspection on November 9, 1979 (Reports Nos. 50-313/79-24 and 50-368/79-23)

The purpose of this unannounced inspection was to verify actions taken with respect to the requirements of Bulletin 79-19. This bulletin was concerned with the proper transfer, packaging and shipment of low level waste radioactive material.

Areas Inspected: Current NRC & DOT regulations, current requirements of waste burial firms, instructions and operating procedures, training, audit program, and contents of applicable audits. One package was opened for inspection. The inspection involved 4 hours by one NRC inspector.

Results: No items of noncompliance with NRC requirements were identified. Two items of concern were identified (lack of a formal training program - Paragraph 2d and lack of an internal audit program - Paragraph 2e). In response to these concerns, the licensee stated that he intends to contract for these services until such time as he develops his own training and audit program.

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DETAILS

1. Persons Contacted

J. P. O'Hanlon, General Manager
J. W. Anderson, Acting Quality Control Supervisor
B. L. Bata, Quality Assurance Engineer
G. H. Miller, Manager of Engineering and Technical Support
D. D. Snellings, Supervisor of Technical Analysis
R. G. Carroll, Supervisor of Health Physics

2. Inspection Activities

a. A current set of DOT and NRC regulations for the transfer, packaging and transport of low-level radioactive waste material was physically located in the Health Physics Supervisor's Office. Dat-O-Line subscriptions are used to keep both sets of regulations current.

b. The licensee routinely ships waste only to Barnwell, South Carolina and does have a current set of Barnwell requirements in the Health Physics Supervisor's Office. In addition, current requirements placed on Beatly, Nevada and Hanford, Washington have been ordered.

c. Procedures for transfer, packaging and transport of low-level waste materials had been prepared, reviewed by the Plant Safety Committee, signed by the General Manager, and copies are on file in the Health Physics Supervisor's Office. The QA manual does describe the establishment of procedures. The procedures do incorporate the provisions of 10 CFR 30.41 in the Radioactive Materials Shipment Checklist. The licensee utilizes HP Form 3.17B for shipments of Type A quantities and HP Form 3.17F for shipments in excess of Type A quantities. These forms incorporate the requirements of 10 CFR 71 and 49 CFR 170-179.

d. Training for personnel involved in the transfer, packaging and transport of low-level radioactive waste material does not exist on a formal basis. Key personnel received a DOT course on packaging and records of this training are on file in the Training Department. At present, operators who actually package materials and health physics personnel who monitor the packaging are trained "on-the-job" and as a consequence, training records do not exist. Accordingly, there exists no formal program for periodic refresher training.

e. An audit program for activities associated with transfer, packaging and transport of low-level radioactive wastes had not been established at the time of this inspection. However, licensee management, in response to IE Bulletin 79-19, did contract

with TERA Corporation to perform a detailed audit which was structured to provide an independent evaluation of the licensee's radwaste program as it relates to the above bulletin. This audit was performed September 6-7, 1979, and a copy was reviewed. It was found to be very comprehensive and addressed all essential areas of concern. The licensee purports that this independent auditor will oversee the training of operations, health physics, and quality assurance personnel and will perform periodic audits until such time as the licensee can perform these functions.

f. The management type audit of the activities associated with the transfer, packaging, and transport of low-level radioactive wastes were reviewed. Audit findings included:

(1) A recommendation that the licensee continue the subscription to Dat-O-Line for maintenance of current regulations;

(2) A recommendation that the licensee management formulate a letter of designation for the person responsible for the safe transfer, packaging and transport of radioactive waste. This was accomplished by a letter of October 8, 1979, naming Mr. Raymond G. Carroll as the designated individual;

(3) An acknowledgement to the availability of procedures for all personnel involved in the transfer, packaging and transfer of waste;

(4) A recommendation that a formal documented training program be established.

3. On-site Observations

a. There was no observations of packaging activities since this is normally done first thing on day shift, and the inspector was not inside the security area at that time.

b. Barrel No. 521, which was awaiting shipment, was selected by the inspector for opening. Its contents were dry compacted LSA wastes with no free standing water. The licensee purports that resins have not been shipped since August 10, 1979. At present, resins are being stored pending a contract with Hittman Nuclear Development Corporation to come onsite to solidify resins with concrete.

4. Exit Interview

The inspector met with AP&L representatives at the ANO-1 site at the conclusion of the inspection on November 9, 1979. The inspector summarized the purpose and scope of the inspection, and discussed the inspection findings.