#### U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 5	0-245/79-30 0-336/79-31 0-245 0-336				
	PR-21	Priority		Category	С
Licensee: N	ortheast Nuclea	r Energy Company			
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_H	artford, Connec	ticut 06101	<u>na</u>		
Facility Name	e: Millstone,	Units 1 and 2	<u>Hu</u>		
Inspection at	: Waterford,	Connecticut			
		ember 19-20, 1979			
Inspectors:	P. E. Clemons,	Radiation Speci	alist	1/3	signed
				date	signed
	0121	0		date	signed
Approved by		Acting Chief, tion, FF&MS Branc		1/ale	signed

# Inspection Summary:

Inspection on December 19-20, 1979 (Report Nos. 50-245/79-30; 50-336/79-31)

Areas Inspected: Special, unannounced inspection by a regional based inspector of the licensee's response to Bulletin 79-19 including: regulatory requirements, procedures, training, audits, records of shipments and onsite observations. The inspection involved 14 inspector-hours on site by one NRC regional based inspector. Results: No items of noncompliance or deviations were disclosed.

### DETAILS

### Persons Contacted

### Principal Licensee Employees

Mr. A. Cheatham, Health Physics Supervisor

\*Mr. E. Mroczka, Station Services Superintendent

\*Mr. J. Opeka, Station Superintendent

\*Mr. F. Whitaker, Radiation Protection Supervisor - Unit 2

The inspector also interviewed other licensee employees during the course of the inspection. They included a Training Coordinator, an Operations Supervisor, an Operations Technician, a Maintenance Engineer, the Unit 1 Radiation Protection Supervisor, and a Radioactive Waste Plant Equipment Operator, and the Chemistry Foreman.

\*denotes those present at the exit interview.

# 2. Review of Licensee's Response to IE Bulletin 79-19

The inspector reviewed Northeast Utilities response to IE Bulletin 79-19, inoffice to assure that all information required by the bulletin was included, and to ascertain that corrective action commitments were also included.

## 3. Organization

The licensee stated in his response to IE Bulletin 79-19 that Administrative Control Procedures identify the responsible positions for the safe transfer, packaging and transport of low-level radioactive material.

The inspector reviewed Administrative Control Procedure No. ACP-6.07, Revision 0, dated June 12, 1979 entitled "Management of Radioactive Waste." This procedure was approved by the Safety Operating Review Committee (SORC) and it did designate employees in the organization who are responsible for the safe transport, packaging and transport of low-level radioactive waste.

# 4. Regulatory Documents

The inspector verified that the licensee has a current set of DOT and NRC regulations. The licensee maintains a copy of 10 CFR from the U.S. Government Printing Office, Superintendent of Documents as part

of a subscription service. This service apparently assures that the 10 CFR is maintained current.

The licensee also has a subscription to Datomation Inc. that apparently assures that the DOT regulations are maintained current.

## Burial Site Requirements

According to a licensee representative, waste shipments are made only to the burial site in South Carolina. At the inspectors request, he was shown a copy of Chem-Nuclear's License No. 097, Amendment No. 26, that was issued by the State of South Carolina. The inspector also reviewed a copy of the Barnwell Site Disposal Criteria which has an effective date of December 1, 1979.

### 6. Procedures

In response to IE Bulletin 79-19, the licensee stated that "approved detailed instructions and operating procedures presently exist and are adequate to insure the safe transfer, packaging and transport of low-level radioactive waste." The licensee also stated that "a review of these instructions and procedures against the bulletin will be conducted and the instructions and operating procedures revised if required, by January 1, 1980." The inspector reviewed the following procedures that had been reviewed, revised, and submitted to SORC for approval:

- a. "Solid Radwaste System," Procedure No. OP313A, Revision 8
- b. "Solidification Procedure," Procedure No. OP313B, Revision 2
- c. "Radioactive Solidification System," Procedure No. GP2338D, Revision 2.

The inspector also reviewed the following procedures that are used by the licensee:

- d. "Shipment of Radioactive Materials, Procedure No. HPP928/2928, Revision 8
- e. "Shipment of Solidified Liquid Radioactive Waste," Procedure No. HPP928/2828A-2, Revision 2
- f. "Shipment of Contaminated Compactible and/or Non-compactible Waste," Procedure No. HPP928/2828A-3, Revision 1

- g. "Shipment of Radioactive Spent Resin/Filter Media Waste," Procedure No. HPP928/2928A-4, Revision 1
- h. "Shipment of Large Quantity Radioactive Material," Procedure No. HPP928/2928A-5, Revision 5.

The inspector asked a licensee representative how they assured themselves that all appropriate employees had received and reviewed the above procedures. The inspector was informed that employees are required to sign a "sign-off" sheet indicating that they had reviewed and understood the procedures.

## 7. Training

In response to Bulletin No. 79-19, the licensee stated that training and re-training in the DOT and NRC regulatory requirements, the waste burial license requirements, and in internal instructions and operating procedures presently exist.

The inspector reviewed the procedures cited in Item 6 above, which contains the DOT and NRC requirements, and as stated before, employees are required to sign a "sign-off" sheet which indicates that they have read and understand the procedures.

The licensee also stated that training and re-training of employees who operate the processes which generate waste also exist.

The inspector was given a list of names of Plant Equipment Operators (PEO) who operates the processes that generate waste and asked the Training Coordinator to verify that these individuals had received the stated training. The records provided by the Training Coordinator indicated that six Plant Equipment Operators had not received any training in the processes that generate waste, contrary to the statement in the preceding paragraph.

### 8. Audit

The inspector verified that the licensee has established management control audit functions of the transfer, packaging and transport of activities associated with low-level radioactive waste.

The inspector noted that this function was documented in Procedure ACP-QA-6.04, Revision No. 10, "Radioactive Material Shipping Requirements." The procedure had been approved by SORC.

The inspector also noted that an audit had been conducted by the licensee's Quality Assurance Department on September 10, 1979. The inspector observed that the audit was primarily concerned with the procedures governing the shipment of radioactive waste, and it did not address training. The inspector was informed by a licensee representative that the Quality Assurance Department audits each shipment of radioactive waste.

## 9. Onsite Observations

On December 19, 1979, the licensee had just completed loading a Chem-Nuclear Cask, No. 21-300-8 with liquid waste and urea formaldehyde as the inspector entered the Radwaste Loading Area in Unit I. The inspector looked into the container and noted that the majority of the mixture appeared to have solidified, but there was a small amount of free standing liquid on the surface. The inspector was informed that the mixture would be allowed to stand over night and on the next day it would be inspected to see if the iree standing liquid had been absorbed. If the liquid had not been absorbed, cement would be added until such time as no free standing liquids could be observed.

## 10. Records of Shipments

As the inspector reviewed shipping records, he observed a shipment made on March 9, 1979. The inspector noted the shipment was made in the Chem-Nuclear shipping container No. 14-195H and it contained 6 Curies of radioactive waste. The inspector requested to see a copy of the Certificate of Compliance.

The inspector was given a copy of Certificate of Compliance No. 9094, Revision 3. The inspector noted that the Certificate of Compliance referenced various documents, and he requested to see the referenced documents. A licensee representative provided the inspector with copies of all referenced documents.

No items of noncompliance were identified.

# 11. Discrepancy Report

The inspector discussed a Discrepancy Report of a shipment of radioactive waste that was made by the licensee on April 9, 1979 and received at Barnwell, S.C. on April 11, 1979. The shipment involved the Home Transportation Company as the carrier, transporting the Chem-Nuclear shipping cask containing 1.02 curies of mixed fission products contained in dewatered spent resins. The cask was inspected upon receipt at Barnwell and the inspection revealed that 6 bolts were loose and 1 bolt was missing from the cask.

The licensee informed the inspector that the corrective action taken was to institute a program whereby the Quality Assurance Department would inspect each shipment prior to the departure from the licensee's site.

## 12. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on December 20, 1979. The inspector summarized the purpose and scope of the inspection, and the findings as presented in this report.