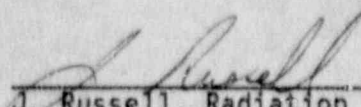


U. S. NUCLEAR REGULATORY COMMISSION

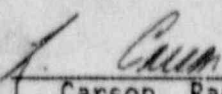
REGION V

Report No.: 50-344/89-21
License No.: NPF-1
Licensee: Portland General Electric Company
121 SW Salmon Street
Portland, Oregon 97204
Facility Name: Trojan Nuclear Plant
Inspection at: Rainier, Oregon
Inspection Conducted: 11 through 15 September 1989

Inspectors:

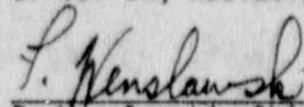


J. Russell, Radiation Specialist 9-28-89
Date Signed



L. Carson, Radiation Specialist 9-28-89
Date Signed

Approved by:



F. Wenslawski, Chief 9/28/89
Date Signed
Facilities Radiological Protection Section

Summary:

Areas Inspected:

This was a routine, unannounced inspection covering the followup of written reports of non-routine events; followup of open and unresolved items; followup of items of noncompliance; review of periodic reports; occupational exposure control, shipping and transportation; radioactive waste systems and environmental monitoring; external exposure control and dosimetry; internal exposure control and assessment; control of radioactive materials, contamination, surveys and monitoring; and radioactive waste management. The inspection included tours of the licensee's facilities. Inspection procedures 92700, 92701, 92702, 90713, 83750, 84750, 83724, 83725, 83726, 84250, 86721 and 30703 were covered.

Results:

In the areas inspected, the licensee's programs appeared adequate to the accomplishment of their safety objectives. However, weakness was exhibited in the area of occupational exposure control (ALARA), as detailed in paragraph 6. A further weakness was exhibited in the area of

radiation monitor calibration documentation and an attendant open item, involving radioactive effluent monitor setpoint determinations, was identified, as detailed in paragraph 7.

DETAILS

1. Persons Contacted

Licensee Personnel

J. Lentsch, Personnel Protection Manager
T. Meek, Radiological Protection (RP) Branch Manager
G. Zimmerman, Radiological Safety Branch Manager
D. Nordstrom, Quality Operations (QO) Branch Manager
S. Bauer, Nuclear Regulation Branch Manager
N. Dyer, Health Physics (HP) Supervisor
L. Price, Radioactive Waste (RW) Unit Supervisor

Oregon Department of Energy

A. Bless, Resident Inspector

NRC Resident Inspector

R. Barr, Senior Resident Inspector

All of the above noted individuals were present at the exit interview on 15 September 1989. In addition to these, the inspector met and held discussions with other members of the licensee's staff.

2. Followup of Written Reports of Nonroutine Events (92700)

Item 50-344/89-14-LO (Closed). Milk and drinking water samples; required by Technical Specification (TS) 4.12.1, Radiological Environmental Monitoring; were not collected at the frequency specified in Table 3.12-1 and this matter was not reported in the Annual Radiological Environmental Monitoring Report. The milk and water samples were not collected at the required frequency due to a failure to adhere to procedural requirements and a mechanical breakdown, respectively. This matter was identified by the licensee's Quality Assurance (QA) organization during a periodic audit. The inspector verified that the corrective actions specified in the Licensee Event Report (LER) were being implemented and it appeared that they would be effective to prevent recurrence. The Annual Report was amended by a letter from T. Walt to USNRC, dated 28 July 1989. The inspector had no further questions in this matter.

Item 50-344/89-15-LO (Closed). This informational LER described actions relative to issues concerning the Hydrogen Gas Supply System identified by previous inspectors and delineated in Inspection Reports 50-344/89-07 and 89-18. This matter was resolved by enforcement item 89-18-01. No further action appeared necessary.

3. Followup of Open and Unresolved Items (92701)

Item 50-344/89-06-01 (Closed). This inspector identified item involved the need for further evaluation of the qualifications of the proposed new Radiation Protection Manager (RPM) with respect to the guidance provided in Regulatory Guide (RG) 1.8, Personnel Selection and Training, and mandated by TS 6.3, Facility Staff Qualifications. The inspector reviewed a memorandum from J. Lentsch to C. Yundt, dated 25 April 1989, which delineated the qualifications of the proposed new RPM and documented that sufficient applicable professional experience will appear to have been obtained at the completion of an understudy period in January 1990. Licensee management intends to make the formal appointment at that time. The inspector had no further questions in this matter.

Item 50-344/89-07-04 (Closed). This unresolved item originally identified concerns relative to the storage of hydrogen and nitrogen on the roof of the Control Building. The concerns relative to the storage of hydrogen were resolved in Inspection Report 50-344/89-18 and enforcement item 89-18-01. In the matter of nitrogen storage; licensee management representatives stated during an enforcement conference on 10 May 1989 that 1) oxygen monitors had been temporarily installed in the Control Room (CR), 2) analyses were being performed, in accordance with RG 1.78, on potential nitrogen introduction into the CR ventilation intakes and missile hazards from potential tank ruptures, and 3) that a report would be submitted to the NRC prior to startup from the refueling outage.

An NRC Safety Evaluation, provided in a memorandum from M. Virgilio to R. Scarano, dated 1 August 1989, concluded that the oxygen monitoring of the CR should continue in order to prevent incapacitation of the operators in the event of a gross nitrogen leak.

The inspector was informed on 15 September 1989 that the oxygen monitors had been removed from the CR based on an evaluation performed by a contractor for the licensee. The evaluation was reviewed and appeared to provide sufficient documentation that the CR would not be subjected to an asphyxiating atmosphere from either a 3/4" nitrogen line break or the catastrophic failure of all the nitrogen tanks on the CR roof. The inspector had no further questions in this matter.

4. Followup on Corrective Action for Violations (92702)

Item 50-344/89-14-01 (Closed). This item involved the failure to assign and use tags to identify the temporary lead radiation shielding structures installed in the Reactor Containment Building and the Auxiliary Building. The inspector verified that the corrective actions, specified in the licensee's timely response, had been implemented. It appeared that they would be effective to prevent recurrence. The inspector had no further questions in this matter.

Item 50-344/89-18-01 (Open). This item involved the failure to evaluate and correct design deficiencies in the Hydrogen Gas Supply System which were identified in an Operational Assessment Review (OAR) in response to NRC Information Notice 87-20. The inspector verified that the system

modifications and tank relocations noted in the licensee's response to the NOV and delineated in LER 89-15 had been completed. The OAR program revisions were in process and will be evaluated during a future inspection.

5. Review of Periodic Reports (90713)

Operational Environmental Radiological Surveillance Program Annual Report

An in-office review of the timely 1988 Annual Radiological Environmental Monitoring Report, submitted in accordance with the requirements of TS 6.9.1.4 and 6.9.1.5, was performed. The report provided data, interpretations and analyses of radiological environmental samples and measurements in accordance with the program described in TS 3/4.12. Results of the 1988 land use census were also included as well as the results of licensee participation in the USEPA Laboratory Intercomparison Program. Comparison with previous environmental surveillance reports supported the conclusion that airborne radioactivity, direct radiation and aquatic activity; among other dose pathways from the environment to man; did not significantly impact plant environs. The report summarized data in accordance with the format of TS Table 6.9-1 and summarized the program in accordance with the format of RG 4.8 (1975).

Deviations from sampling requirements for milk and drinking water were provided in the report and in an amendment to the report, provided by a letter from T. Walt dated 28 July 1989. These appeared to have been minor in nature and to have had a negligible impact on the sampling results. The presence of Cs-137 and Cs-134 were noted in milk samples, primarily from one of the four sampled dairies, location 63. Levels up to 49 pCi/l were detected. The licensee attributed this activity to Chernobyl fallout and the tendency of goats to concentrate activity in milk. It was noted that another goat dairy, location 17A, detected activity in only one of seventeen samples whereas location 63 detected activity in sixteen of twenty-one samples. It was also noted that Cs-134 activity, $T_{1/2} = 2y$, persisted in six of the eighteen samples in which activity was identified.

No samples were available from location 17A during the months of January through March 1988 due to seasonal unavailability. A licensee management representative stated that the inability to obtain milk samples from one of the four TS sampling locations due to seasonal unavailability had been determined not to require reporting in accordance with the requirements of TS 3.12.1. Whereas, the sampling of milk on a few occasions at a 21 day vice a 15 day frequency and an equipment malfunction of a water sampler, as noted in LER 89-14, was determined to require reporting.

Sample analysis systems appeared to achieve LLDs at or below the levels required by the TS. No samples appeared to indicate activity in excess of the reporting limits specified in TS Table 3.12-2.

Semiannual Radioactive Effluent Release Report

An in-office review of the January-June 1989 Semiannual Radioactive Effluent and Waste Disposal Report, submitted in accordance with the requirements of TS 6.9.1.4 and 6.9.1.5, was performed. Radioactive releases and resulting doses for the period appeared to be below the limits of TS 3/4.11 and in accordance with design predictions. Liquid and gaseous releases appeared low. The assessment of doses to offsite members of the public appeared to be performed in accordance with the methodology specified in the Offsite Dose Calculation Manual (ODCM) and were within the specified limits. No changes to the ODCM or Process Control Program (PCP) were documented. No unplanned releases were noted. Fourteen radioactive waste shipments were documented and included dewatered resin, filters, sludges, dry compressible waste and contaminated equipment.

The licensee seemed to be maintaining their previous level of performance in this area and their program appeared adequate to the accomplishment of its safety objectives. No violations or deviations were identified.

6. Occupational Exposure, Shipping and Transportation (83750)

PGE QA Audit DNL-73-89, which was performed during May 1989 and which addressed some areas of occupational exposure control, was reviewed. It was noted that an audit of the Radwaste program, which is to include the shipping and transportation of radioactive material, was scheduled for October 1989, the last audit of this area having been performed in October 1987. The audit findings appeared to have been appropriately addressed and corrective actions appeared technically correct. Personnel performing the audit appeared experienced and qualified in accordance with the requirements of ANSI/ASME N45.2.23-1978, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants. The audit team included a technical expert in Health Physics from the Washington Public Power Supply System.

Changes in the organization, personnel, facilities, equipment, programs and procedures were discussed with the cognizant area supervisors and managers. A new RW Unit Supervisor as well as a new RP Technical Support Supervisor had been appointed since the last inspection. The RPM stated that there were 16, ANSI 18.1 qualified, RP technicians and 4 junior technicians at the time of the inspection. No other major changes were identified.

The HP training and qualification program was discussed briefly. No major changes were identified. One of the inspectors attended the licensee's General Employee Training.

The external exposure control program was examined by observation, discussion with responsible personnel and review of select documents. The Trojan dosimetry program was fully NVLAP accredited. Trojan employs a three element thermoluminescent dosimetry card with windows of 7, 300 and 1000 mg/cm² for whole body monitoring and single chip rings for extremity monitoring.

During the course of the inspection, the Auxiliary Building, the Turbine Building, the Control Building, the Fuel Building and various radioactive material storage and processing areas were toured.

Radiation and high radiation areas appeared to be appropriately posted in accordance with the requirements of 10 CFR 20.203, Caution signs, labels, signals and controls. General area and maximum contact dose rates were specified which corresponded with the readings obtained by the inspector using a model RO-2 ionization chamber, serial number 2694, calibrated on 26 June 1989 and due for calibration on 26 September 1989. Select Radiation Work Permits (RWP) and surveys were reviewed. All appeared to have been completed in accordance with the applicable site procedures.

The inspector observed work in the areas indicated above and noted personnel were appropriately wearing dosimetry. Interviewed workers were generally aware of the requirements of their RWP, their individual exposure totals and limits and the need to perform work such that radiation exposures are ALARA.

The licensee's internal exposure control program was examined by review of select documents and interviews with responsible personnel. Airborne radioactivity surveys, vendor calibrations of the whole body counters, personnel whole body counts and the placement of air sampling equipment were reviewed for the period of the inspection and appeared to have been completed in accordance with program requirements.

No exposures to airborne radioactive material in excess of the 10 CFR 20.103, 40 MPC-h, investigation level were noted. The HP supervisor stated that there had been no positive whole body counts which indicated activity in excess of the licensee's 5% of a Maximum Permissible Organ Burden (MPOB) investigation limit. Three WBCs, which indicated depositions of approximately 1% of a MPOB, were reviewed and reflected exposures of a few MPC-h. Program implementation appeared to be in compliance with the requirements of 10 CFR 20.103, Exposure of individuals to concentrations of radioactive materials in air in restricted areas.

Observed monitoring instrumentation appeared to be in current calibration and had been performance checked. Current contamination surveys were also reviewed and appeared complete. Housekeeping in the more visible, frequently travelled areas of the plant appeared good. However, housekeeping in the less frequently travelled areas, particularly in some warehouses and radioactive material storage areas could have been improved. Of particular note was the outside "High Radiation Storage Area" in which the materials, much of which had been in storage for extended periods, were showing the effects of the weather. A number of metal containers were observed to be rusting, some radioactive material labels were illegible or missing, and some had standing water on them. This matter was brought to the licensee's attention during the course of the inspection and at the exit interview. Licensee management representatives acknowledged the inspector's observations, noted that previous inspectors had made the same observations, and lamented that budgetary constraints have not yet allowed for construction of a protected storage facility.

The ALARA program was discussed with ALARA group personnel to determine the current state of program implementation. The following current procedures were reviewed:

RPMP-13	<u>ALARA Work Plan Procedure</u>
RPMP-15	<u>Summary of ALARA Program</u>
RPMP-15-1	<u>Prejob ALARA Review</u>
RPMP-15-2	<u>Monitoring RWP Progress</u>
RPMP-15-3	<u>Postjob ALARA Review</u>

Dose equivalent goals, by job, for this year's refueling outage and dose equivalent expenditures by work group and job for the year to 25 July 1989, were reviewed. The issuance of weekly Exposure Summaries was also reviewed. An annual site goal of 295 person-rem had been established for 1989. This goal had been revised to 360 person-rem to incorporate expanded work during the outage. A total of approximately 408 person-rem had been expended to 25 July, significantly exceeding the annual goal. Licensee management representatives stated that this corporate goal was based on the Institute for Nuclear Power Operations (INPO) PWR yearly median and upper quartile average and did not consider the scope of work to be accomplished during the year. It was noted that Trojan performs an annual refueling as opposed to the average PWR refueling cycle of 18 months.

Of the 62 outage tasks for which dose equivalent goals of greater than 1 rem were established, only 9 were accomplished within + 10% of the goal and only 20 were accomplished within + 20% of the goal. 29 tasks were more than 20% under their goal and 13 tasks were more than 20% over their goal. Of particular note was Plant Modification 89-513, Replace Degraded Cables/Instl. Temp RTD's, for which, the inspector was informed, the corporate ALARA group proposed an ALARA goal of 150 person-rem. The onsite ALARA group, recognizing that this goal would not be reflective of the actual job exposure, established a goal of 59 person-rem and the task was accomplished for 14 person-rem. It was not clear whether this performance was reflective of an outstanding effort in accomplishment or a poor one in projection.

Discussion with ALARA group personnel revealed that only two individuals were continuously involved in researching and setting task specific ALARA goals, although additional contractor support was obtained during outages, and that they were also assigned other jobs, e.g. writing all RWPs. It appeared that significant improvements could be made in the accuracy of dose equivalent projections for particular tasks and the establishment of goals.

RG 8.10, Operating Philosophy for Maintaining Occupational Radiation Exposures As Low As Is Reasonably Achievable, states that the objective of ALARA programs is to reduce occupational exposures as far below the specified limits as is reasonably achievable by means of good radiation protection planning and practice, as well as by management commitment to

policies that foster vigilance against departure from good practice. RG 8.8, Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable, states further that management responsibilities and authorities should ensure that an effective measurement system is established and used to determine the degree of success achieved by station operations with regard to program goals and specific objectives and that the resources needed to achieve goals and objectives, to maintain occupational radiation exposures ALARA, should be made available.

It appeared that the setting of annual goals based on INPO averages rather than the number and scope of planned tasks could not be effective in fostering vigilance against departures from good practice or that they could be used to determine the degree of success achieved by station operations, in as much as the basis of the goal fails to consider the actual work which entails the occupational exposure. Additionally, recognizing the extensive plant survey and work history information that is now available for planning exposures and setting goals, task specific goals which are consistently challenging and will be reflective of successful performance could be commonplace if sufficient resources are made available. This matter was discussed by the inspector during the course of the inspection and at the exit interview. Licensee management representatives stated that they appreciated the observations and that they would examine the situation.

Records of four radioactive waste shipments; 89-03, 08, 68 and 74; were reviewed. Radiation and contamination surveys; shipping papers; records of package marking and labeling; records of package loading, blocking and bracing; and records of vehicle placarding and driver instruction appeared complete and in compliance with the various NRC and DOT requirements as well as State and burial ground requirements. The licensee's quality assurance program for the use of NRC-certified transport packages was specified in Appendix B of the PGE Topical Quality Assurance Report, PGE-8010. This appeared to comply with the requirements of 10 CFR 71 Subpart H. The program for radioactive waste management was specified in Appendix C and appeared to comply with the requirements of 10 CFR 61 and to be in accord with 10 CFR 20.311.

Licensee management representatives informed the inspector that there had been no transportation incidents involving licensee shipments and that no violations had been issued by State regulatory authorities for any shipment during 1989.

The licensee seemed to be maintaining their previous level of performance in this area and their program appeared adequate to the accomplishment of its safety objectives. However, weakness was exhibited in the area of ALARA and the licensee's program appeared marginal in this area. No violations or deviations were identified.

7. Radioactive Waste Systems and Environmental Monitoring (84750)

PGE QA Audits DNL-73-89 and DNL-127-89, which were performed during May and June 1989, respectively, and which addressed some areas of

radioactive waste systems and environmental monitoring, were reviewed. Three Event Reports (ER), which documented noncompliances with TS 3.12 and 4.3.3.10.1, were identified by the QA organization. The ER appeared to have been appropriately addressed and corrective actions appeared timely and technically correct. Personnel performing the audits were experienced and appeared to be qualified in accordance with the requirements of ANSI/ASME N45.2.23-1978. The audit teams included a technical expert in Health Physics from the Washington Public Power Supply System and a QA Engineer from Arizona Public Service.

Changes in the organization, personnel, facilities, equipment, programs and procedures were discussed with the cognizant area supervisors. No major changes were identified.

The licensee's program for determining the quantity and radionuclide composition of solid radioactive wastes was reviewed for the waste shipments noted in paragraph 6, above. The licensee's PCP appeared as detailed in the ODCM. Wastes are routinely dewatered rather than solidified.

The last available Semiannual Radioactive Effluent Release Report was reviewed as noted in paragraph 5, above.

The major sources of radioactive solid, liquid and gaseous waste appeared to be as previously identified. Select process and effluent monitors were observed and all appeared to be operating properly. Records of the most recent 18 month channel calibrations of the containment purge noble gas monitors, PRM-1C and 1D, performed during the 1989 refueling outage, were reviewed. The calibration records appeared adequate to the requirements of TS 3/4.3.3.11 with the following exception. The initial steps of calibration procedure, MP-2-32, section VII-G, step 1, states: "Record the background count." Review of the calibration data sheets revealed that this step was not completed for these calibrations. This step did not appear to be integral to the adequate completion of the instrument calibration. However, it did appear to indicate a lack of attention to detail in execution of the procedure. The inspectors also noted that the calibration records contained uninitialled line-outs and blanks. These observations were discussed by the inspectors during the course of the inspection and at the exit interview in the context of poor work practices and failures to adhere to quality recordkeeping practices. Licensee management representatives acknowledged the inspectors' observations and a QO representative stated that the matter would receive further review.

The CR readouts for PRM-1C and 1D were observed and the determination of their setpoints was discussed with the Assistant Shift Supervisor. The instruments were reading approximately 10,000 cpm at the time of the tour and the alert and high alarm setpoints were set at 2X and 4X this level, respectively. The log of alarm setpoints for 1C and 1D was reviewed for the period 23 July through 9 September 1989. It was noted that the "background" varied over the range of 150 to 30,000 cpm during this period. When questioned, the Assistant Shift Supervisor stated that the background varied considerably with plant mode and that Operations

Procedure OM-5-1-3, PRM Setpoint Tracking, provided no limit on the level to which the alarm setpoints could be raised.

A review of OM-5-1-3 revealed that the setpoints could be changed "as required," but, step 3.2, also required that background changes be investigated to identify the cause of such changes. Further review appeared necessary to determine whether the variation of the containment noble gas monitor "background" over two orders of magnitude was appropriate and not reflective of an unmonitored release of airborne radioactive material. This matter is considered an open item (50-344/89-21-01).

Records of the Control Room Emergency Ventilation System and Spent Fuel Pool Exhaust System di-octyl-phthalate and iodine removal tests, performed during the 1989 refueling outage, were reviewed. The records appeared complete and timely. No recurrent problems were identified. The tests appeared to conform to the recommendations of RG 1.52, Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants, and to comply with the requirements of TS and 3/4.7.6 and 3/4.9.12.

The licensee's Annual Radiological Environmental Operating Report for 1988 was reviewed as described in paragraph 5, above.

Radiological environmental monitoring site facilities were visited and the program was discussed with the HP supervisor. Select monthly interlaboratory analytic sampling results from 1988 were reviewed. No substantive program changes were noted since the program was last reviewed.

The meteorological monitoring tower was toured and equipment operation was discussed with the assigned I & C technician. Select calibration procedures and calibration records were also reviewed from the 1989 refueling outage. Instrumentation appeared to be in compliance with the requirements of TS 3/4.3.3.4.

The licensee seemed to be maintaining their previous level of performance in this area and their program appeared adequate to the accomplishment of its safety objectives. An open item, relative to the variability of PRM-1C background readings, was identified. No violations or deviations were identified.

8. External Occupational Exposure Control and Dosimetry (83724)

This area was also addressed in paragraph 6, above, and in Inspection Report 50-344/89-14.

Radiological Event Reports were reviewed for the period January 1989 to date. The problems identified appeared to have been appropriately addressed and corrected.

The inspector interviewed several RP and RW technicians during plant tours to ascertain their knowledge of health physics and plant

procedures. All appeared well informed and cognizant of their duties and responsibilities.

Select Form NRC-4 and 5 equivalents were reviewed for the period January 1989 to date. These appeared to have been appropriately completed and no exposures in excess of the limits specified in 10 CFR 20.101, Radiation dose standards for individuals in restricted areas, were noted.

The licensee seemed to be maintaining their previous level of performance in this area and their program appeared adequate to the accomplishment of its safety objectives. No violations or deviations were identified.

9. Internal Exposure Control and Assessment (83725)

This area was also addressed in paragraph 6, above, and in Inspection Report 50-344/89-14.

Respiratory protective equipment cleaning and testing areas were toured and RPMP-7, Instructions for Respirator Issue and Use, was reviewed.

Select records of the quantifications of airborne radioactivity intakes and uptakes were reviewed for the period of the 1989 refueling outage. Exposures and associated depositions appeared to have been appropriately determined. No deficiencies were identified.

The licensee seemed to be maintaining their previous level of performance in this area and their program appeared adequate to the accomplishment of its safety objectives. No violations or deviations were identified.

10. Control of Radioactive Materials and Contamination, Surveys and Monitoring (83726)

This area was also addressed in paragraph 6, above, and in Inspection Report 50-344/89-14.

Select packets of daily surveys were reviewed for the period 1 September to date. All appeared complete. Other than the deficiencies noted in paragraph 6, above, radioactive materials appeared to be appropriately controlled and properly labelled.

Procedure RPMP-7, Personnel and Clothing Contamination Reports, was reviewed as well as select reports for the period June through September 1989. All appeared complete and appropriate. There had been 70 personnel contaminations to that point in 1989. Many of these were noted to be facial and head contaminations which appeared to reflect poor personnel contamination control practices. This observation was discussed with the RPM.

The licensee seemed to be maintaining their previous level of performance in this area and their program appeared adequate to the accomplishment of its safety objectives. No violations or deviations were identified.

11. Radioactive Waste Management (84850)

This area was also addressed in paragraph 7, above.

The RW supervisor and cognizant personnel were interviewed and select records of waste manifests, shipment labelling, and shipment tracking were reviewed as noted in paragraph 6, above.

Select examples of radioactive waste classification and characterization were reviewed for shipments during 1989. These appeared complete and appropriate.

The inspector determined that the licensee appeared to be adequately maintaining disposal site licenses and reviewed the State of Washington license for the Hanford Low-Level Waste site. The Certificates-of-Compliance, for the Type B containers currently in use, were also reviewed and appeared complete.

The licensee seemed to be maintaining their previous level of performance in this area and their program appeared adequate to the accomplishment of its safety objectives. No violations or deviations were identified.

12. Transportation (86721)

This area was also addressed in paragraph 6, above.

Licensee practices regarding the procurement and reuse of packaging was discussed with the cognizant RW personnel. No deficiencies were identified.

Documentation for the radioactive material shipments noted above appeared to be in compliance with the noted quality assurance program requirements and NRC and DOT regulations.

The licensee seemed to be maintaining their previous level of performance in this area and their program appeared adequate to the accomplishment of its safety objectives. No violations or deviations were identified.

13. Exit Interview (30703)

The inspector met with the licensee representatives, denoted in paragraph 1, at the conclusion of the inspection on September 15, 1989. The scope and findings of the inspection were summarized.