

U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Report No. 50-334/82-19

Docket No. 50-334

License No. DPR-66 Priority -- Category C

Licensee: Duquesne Light Company

P. O. Box 4

Shippingport, Pennsylvania 15077

Facility Name: Beaver Valley Power Station, Unit No. 1

Inspection At: Shippingport, Pennsylvania

Inspection Conducted: July 21-23, 1982

Inspectors: *John P. Clemons* 8/20/82  
P. Clemons, Radiation Specialist date

Approved by: *Edward J. Greenman* 8/3/82  
E. Greenman, Acting Chief, Facilities date  
Radiation Protection Section,  
Technical Programs Branch

Inspection Summary:

Inspection on July 21-23, 1982 (Report No. 50-334/82-19)

Areas Inspected: Routine, unannounced safety inspection by a region based inspector of transportation activities including: outstanding items, design verification, shipping packages, audits, training, shipments, and record maintenance. The inspection involved 22 inspector hours on-site by one region-based inspector.

Results: Three violations were identified: Failure to follow Certificate of Compliance instructions (Paragraph 4); failure to verify package design specifications (Paragraph 5); failure to maintain quality assurance records (Paragraph 6).

## DETAILS

### 1. Persons Contacted

Mr. D. Blair, Health Physics Specialist  
\*Mr. S. Fenner, Director, Operations Quality Control  
Mr. D. Hunkele, Director, Quality Assurance  
\*Mr. H. Jenkins, Rad Waste Disposal Coordinator  
Mr. K. Keegan, Chief Clerk  
\*Mr. J. Kosmal, Radcon Operations Coordinator  
\*Mr. W. Lacey, Chief Engineer  
\*Mr. F. Lipchick, Senior Compliance Engineer  
\*Mr. D. Roman, Senior Quality Assurance Engineer  
\*Ms. C. Sabol, Quality Assurance Engineer  
Mr. J. Sieber, Manager, Nuclear Safety and Licensing  
\*Mr. S. Sovick, Senior Compliance Engineer  
Mr. J. Vasselo, Nuclear Training Supervisor

#### NRC

\*Mr. W. Troskoski, Resident Inspector

\*Denotes those present at the exit interview.

### 2. Licensee Action on Previous Inspection Findings

(Closed) Inspector Follow-up Item (334/78-11-03). Respiratory protection device inspection and maintenance procedures did not meet Regulatory Guide 8.15 requirements. Currently the licensee does not take credit for respiratory protective devices.

(Closed) Inspector Follow-up Item (334/79-26-02). Licensee method of ascertaining who has had an annual medical review. The inspector verified that the licensee has a computerized program for initiating the medical review program. The Radcon Operations Coordinator receives a monthly printout, and it is his responsibility to see that the individuals listed in the printout receive the appropriate medical review.

(Closed) Inspector Follow-up Item (334/80-20-04). Review Duquesne Light Company improvements in Radcon Manual ALARA policies for strengthening implementation. The inspector reviewed Radcon Procedure No. 8.5, "ALARA Review," that was developed, approved, and implemented to strengthen the ALARA program.

(Closed) Infraction (334/80-22-01). Failure to complete Form NRC-4 prior to exceeding 1.25 rem per calendar quarter. The inspector verified the corrective action described in the licensee's letter dated September 3, 1980, and determined that the corrective action was adequate. The inspector also reviewed the licensee's "Alert System" which is designed to supplement the licensee's radiation exposure status program.

(Closed) Inspector Follow-up Item (334/81-19-01). Review data on tritium analyses from storm sewer samples. The inspector verified that the licensee is currently analyzing the storm sewer samples for tritium. According to the data, tritium analyses started in October 1981, and the data indicates that tritium levels were within the limits specified in Appendix B, Part 20.

(Closed) Inspector Follow-up Item (334/81-32-01). Review licensee's training program with respect to Regulatory Guide 8.27. The inspector determined that the licensee has completed the review of the regulatory guide and is in the process of incorporating the regulatory guide recommendations into their training program. The Nuclear Training Supervisor stated that the revised training program would be implemented by December 31, 1982.

(Closed) Inspector Follow-up Item (334/81-32-02). Review changes to the Radiation Work Permit (RWP). The inspector verified that RCM Form 8.1, Section 10, "Radiological Work/Access Permit - Status Report - Pre-Work Discussion Record" had been revised to require job briefing before the attendees sign the form; and a statement has been added to the effect that the attendees signature verifies that the attendee received and understood the instructions presented.

(Closed) Inspector Follow-up Item (334/81-32-03). Review 10 CFR 19.11 posting requirement. The inspector verified that the Construction Guardhouse was posted with a notice describing where a copy of the facility license and operating procedures could be read.

(Closed) Inspector Follow-up Item (334/81-32-04). Review licensee selection criteria for contractor technicians. The inspector verified that the licensee requires all contractor health physics personnel to be ANSI N18.1-1971 qualified.

### 3. Shipment Documentation

On July 21, 1982, the inspector determined that the licensee made 19 shipments of licensed material during 1982. The inspector selected three shipments to verify compliance with NRC/DOT regulations. The inspector reviewed shipping papers for shipments made on February 12, 1982, June 29, 1982, and July 13, 1982.

No violations were identified.

### 4. Shipping Packages

As a user of packages for the transport of licensed material, the licensee is required by 10 CFR 71.12 to have a copy of the Certificate of Compliance that has been issued for the specific package. The inspector reviewed Certificate of Compliance No. USA/9108/A that was issued for package Model No. AL-33-90. This package was used on June 29, 1982, to transport

solidified resin, containing 11.2 Curies of licensed material, to a burial site in Barnwell, South Carolina.

10 CFR 71.12(b)(1) requires a person using a package, pursuant to the general license provided by this paragraph, to transport licensed material in compliance with the terms and conditions of the Certificate of Compliance for the package. Certificate of Compliance No. 9108, issued for package Model No. AL-33-90, requires secondary containers to meet the requirements for Type A (49 CFR 173.389(f)) packaging.

The inspector noted that the shipping papers, for this shipment, indicated that the secondary container was a "steel liner." The inspector verified that the "steel liner" did not meet the requirements for Type A packaging.

The failure to follow the specifications of the Certificate of Compliance No. 9108 represents a violation of 10 CFR 71.12(b)(1). (82-19-01)

5. Package Design Verification

On July 22, 1982, the inspector determined that the licensee did not have verification that the package used in the June 29, 1982 shipment discussed in Item 3 above had been fabricated in accord with an approved design. The Rad Waste Disposal Coordinator stated that they were not the owners of the package, and they did not have a copy of the verification. He stated that they expected that the owner of the package had the verification. The licensee representative also stated that the fact that the package had been marked with its model number was indicative that the package had been fabricated in accord with an approved design.

10 CFR 71.53(c) states "Packaging shall be conspicuously and durably marked with its model number. Prior to applying the model number, the licensee shall determine that the packaging has been fabricated in accordance with the design approved by the Commission."

The inspector indicated that the user of the package must determine that the package has been fabricated in accordance with a design approved by the Commission; and that the licensee may satisfy this requirement by having the owner of the package provide verification.

The failure to determine that a package was fabricated in accordance with a design approved by the Commission represents a violation of 10 CFR 71.53(c). (82-19-02)

6. Records

10 CFR 71.62(c) requires the licensee to maintain, during the life of a package to which they pertain, quality assurance records of the monitoring, inspection and auditing of work performance during modification, maintenance and repair of the packages.

On July 21, 1982, the inspector determined that the licensee did not maintain quality assurance records as required for the packages used in the three shipments discussed in Paragraph 3. The licensee representative stated again that they were users of the package, and the owner would be expected to maintain such records.

The inspector indicated that the user of the package must maintain the required quality assurance records.

The failure to maintain quality assurance records during the modification, maintenance, and repair of the packages, represents a violation of 10 CFR 71.62(c). (82-19-03)

7. Training

One aspect of Criteria II, Appendix B, 10 CFR 50 is the requirement that the quality assurance program shall provide for training for personnel performing activities that may affect the quality of the program as it relates to shipping packages.

The inspector determined that the licensee provided training in DOT and NRC (10 CFR 71) regulations. This training was provided by contractor personnel, and it was conducted June 9-11, 1982, for operations, quality assurance, quality control, and health physics personnel.

No violations were identified.

8. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on July 23, 1982. The inspector summarized the purpose and scope of the inspection, and the inspection findings.