



Consumers
Power
Company

David P Hoffman
Nuclear Licensing Administrator

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-1636

December 4, 1981

Mr James G Keppler
Office of Inspection and Enforcement
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-155 - LICENSE DPR-6 -BIG ROCK
POINT PLANT - RESPONSE TO NOTICE OF VIOLATION -
EXCEEDED RADIATION LEVEL ON THE EXTERNAL
SURFACE OF AN EXCLUSIVE USE VEHICLE

NRC letter dated November 5, 1981 transmitted a notice of violation as a result of an inspection conducted on October 1, 1981, by a representative of the Department of Social and Health Services, State of Washington, of a waste shipment from the Big Rock Point Plant upon arrival of the shipment at the Richland, Washington low-level waste burial site. Our response to this violation is as follows:

Violation

10 CFR 71.5 prohibits delivery of a licensed material to a carrier for transport unless the licensee complies with applicable regulations of the Department of Transportation in 49 CFR Parts 170-189.

49 CFR 173.292(j)(2) limits the radiation level at any point on the external surface of an exclusive use, closed transport vehicle to 200 mR/hr.

Contrary to the above, on October 1, 1981, a radiation level of up to 300 mR/hr was measured on the undersurface of the transport vehicle containing low-level radioactive waste from the Big Rock Point Nuclear Plant.

Response to Violation

Consumers Power Company acknowledges this notice of violation. On October 1, 1981, a State of Washington Department of Social and Health Services (DSHS) Inspector found a 300 mR/hr hot spot on the bottom of a radioactive waste trailer shipped from Big Rock Point. A Big Rock Point representative, with a

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newly calibrated survey instrument, arrived at the Richland site and measured 260 mR/hr at the spot indicated by the DSHS inspector. The hot spot was very close to the highest contact reading indicated on the shipping papers vehicle survey form which accompanied the shipment.

Reasons for the Violation

Investigation of this shipment indicated that the vehicle survey had been completed and documented per the plant procedures. NRC Region III Health Physics Inspector, Paul Levendale, also surveyed the vehicle prior to its leaving the site. The hot spot was very small in area and it is understandable how it might be missed even by duplicate surveys. Basic cause of the incident is inadequate vehicle survey and more importantly, improper package survey.

Corrective Action Taken and Results Achieved

Package Procedure RM-50 and Shipment Procedure RM-53 have been revised to prevent recurrence of this incident. The procedure changes are itemized below.

RM-50 Solid Radioactive Waste

Section 7.4 Item 7.4.1.4 has been added requiring use of Form RM50-2 for each package. The Form RM50-2 provides instruction for major steps required in packaging and provides documentation of same. Specific survey data actions require surveying the sides, top and bottom of a package. Investigation of this incident revealed the bottom of a package was not always surveyed unless something indicated a hot reading on the bottom.

RM-53 Radioactive Materials Shipments

Section 6 Precautions and Limitations Number 7 was added to the procedures, indicating additional survey requirements if 50% of a limit is exceeded and requiring the Plant Health Physicist to authorize shipments where surveys indicate - 90% of a limit.

Section 7.3 Item 7.3.3.19 revised, requiring the survey instrument to be source checked on all scales used for the shipment survey with documentation on the calibration sheet. These instructions were also added to the instruction sheet for completing shipping form RM-53-3.

Attachment 4 The vehicle survey form has been revised to reflect survey requirements and limits.

The indicated procedure changes were made and issued on November 9, 1981. The changes were reviewed with Health Physics prior to their issuance.

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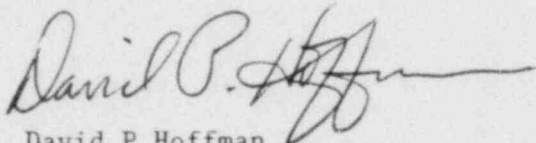
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Planned Corrective Action to Prevent Recurrence

We are confident that the additional actions outlined in the revised procedures will result in properly packaged and transported radioactive waste meeting all Federal and State of Washington requirements. No further action is planned.

Date When Full Compliance Will be Achieved:

The corrective actions stated above have been taken; therefore, full compliance has been achieved. Consumers Power Company, by letter dated November 5, 1981, to DSHS requested reinstatement of the Big Rock Point Nuclear Plant burial permit. Written confirmation was received by Consumers Power Company from DSHS via letter dated November 24, 1981 that burial permit 2330 has been reinstated.



David P Hoffman
Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector-Big Rock Point

CONSUMERS POWER COMPANY
Big Rock Point Plant

Notice of Violation

Response to NRC letter dated November 5, 1981

Docket No 50-155
License No DPR-6

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended, and the Commission's Rules and Regulations thereunder, Consumers Power Company submits our response to NRC letter dated November 5, 1981 which provides a Notice of Violation resulting from an inspection conducted on October 1, 1981 by the Department of Social & Health Services, State of Washington. Consumers Power Company's response is dated December 4, 1981.

CONSUMERS POWER COMPANY

By R B DeWitt 12/4
R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to me this 4th day of December, 1981.

Helen I. Dempski
Helen I Dempski, Notary Public
Jackson County, Michigan
My commission expires December 14, 1981