



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767
Chicago, Illinois 60690

March 5, 1982

Mr. James G. Keppler, Regional Administrator
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Zion Station Units 1 and 2
Response to I.E. Inspection
Report Nos. 50-295/82-02 and
50-304/82-02
NRC Docket Nos. 50-295 and 3U4

Reference (a): February 3, 1982, letter from
C. E. Norelius to Cordell Reed.

Dear Mr. Keppler:

Reference (a) transmitted the results of an inspection by
Mr. P. C. Lovendale of your office on January 18-19, 1982, of acti-
vities at Zion Station. During that inspection, certain activities
appeared to be in noncompliance with NRC requirements. Attachment A
to this letter provides Commonwealth Edison's response to the Notice
of Violation contained in reference (a).

To the best of my knowledge and belief, the statements
contained in this letter and the attachment are true and correct.
In some respects these statements are not based on my personal
knowledge but upon information furnished by other Commonwealth
Edison employees. Such information has been reviewed in accordance
with Company practice and I believe it to be reliable.

Please address questions regarding this matter to this
office.

Very truly yours,

L. O. DelGeorge
Director of Nuclear Licensing

lm
Attachment
cc: Zion Resident Inspector

SUBSCRIBED and SWORN to
before me this 5th day
of March, 1982

Notary Public

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byproduct material as the licensee transferring the material shall the transferee's license authorizes the receipt of the type, form, and quantity of byproduct material to be transferred.

Contrary to the above, the licensee made two shipments of byproduct material to an Agreement State licensee without first verifying if their license authorized receipt.

Corrective Action Taken and Results Achieved

The licensee contacted National Nuclear Corporation (NNC) and obtained a copy of its license. Based on inspection of NNC's license, it was determined that NNC was authorized to receive the byproduct material sent April 15, 1981, but would not have been authorized to receive the 500 Ci of mixed fission products sent August 21, 1981.

The licensee's health physicists were reinstructed on the provisions in Radiation Procedure RP 1520-1, titled "Off-site Shipment of Radioactive Material", which requires that before transferring byproduct material, the licensee verify that the receiver is licensed to receive the type and amount of radioactive material being shipped. RP 1520-1 further states that acceptable methods of verification are listed in 10 CFR 30.41(d). The licensee's health physicists have re-reviewed section 10 CFR 30.41(d) as part of this reinstruction.

Corrective Action To Be Taken to Avoid Further Non-Compliance

A procedure change to RP 1520-1 will be made to explicitly state that the most acceptable method of verification that the receiver is licensed to receive the type and amount of radioactive material being shipped, is by possession and reading of a current copy of the transferee's specific license or registration certificate.

Date When Full Compliance Will Be Met

The licensee is in full compliance at the present time. The procedure change to RP 1520-1 described above will be completed by May 1, 1982.

ATTACHMENT A

Response to Notice of Violation

Violation

10 CFR 30.41(c) states, in part, that before transferring byproduct material to a specific licensee of an Agreement State, the licensee transferring the material shall verify that the transferee's license authorizes the receipt of the type, form, and quantity of byproduct material to be transferred.

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