

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

October 2, 1978

Re: Docket Nos.: 50-277
50-278

Inspection Nos.: 50-277/78-21
50-278/78-26

Mr. Walter G. Martin, Chief
Safeguards Branch
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19404

Dear Mr. Martin:

Your letter of September 18, 1978 forwarded Inspection Report 50-277/78-21 and 50-278/78-26. Appendix A to your letter addresses one activity which did not appear to be in conformance with Nuclear Regulatory Commission requirements. This item is a Deficiency and is listed below with our response.

Section 70.53 (a) states in part "Each licensee who is authorized to possess at any one time and location special nuclear material in a quantity totaling more than 350 grams of contained uranium-235, uranium-233, or plutonium or any combination thereof, shall complete and submit to the Commission Material Status Reports on Form NRC-742, in accordance with printed instructions for completing the form, concerning special nuclear material received, produced, possessed, transferred, consumed, disposed of or lost by the licensee."

The Printed Instructions for completing the Form NRC-742 state in part, the following instructions for Line 72- Decay: "Enter the amount of radioactive decay which occurred during the reporting period for Plutonium and

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Pu-238, when SNM being reported is plutonium, enter the amount of radioactive decay of the Isotope Pu-241 if the decay is 1 gram or more."

Contrary to the above, Material Status Reports submitted for the periods ending March 31, 1977, September 30, 1977, and March 31, 1978 were not completed in accordance with the printed instructions in that the amount of radioactive decay of plutonium during these periods was not reported on the Form NRC-742, and the inspectors verified the Pu-241 decay, to be, in fact, greater than 1 gram for each of the above NRC-742 reporting periods.

Response

Total Plutonium-241 decay during all prior Material Status Report (Form NRC-742) periods, as well as the report period ending September 30, 1978, will be determined and reported on line 72 of Form NRC-742 due to be transmitted for the period ending September 30, 1978.

To prevent a recurrence, in-house isotopic computer analysis methods are being modified to provide an automatic calculation of incremental Plutonium-241 decay during each subsequent six month report period. This decay will be reported on line 72 of each Material Status Report transmitted subsequent to the September 30, 1978 report.

Very truly yours,

