

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-245/82-24
50-336/82-26

Docket No. 50-245
50-336

License No. DPR-21
DPR-65 Priority -- Category C

Licensee: Northeast Nuclear Energy Company

P. O. Box 270

Hartford, Ct. 06101

Facility Name: Millstone Nuclear Power Station

Inspection At: Waterford, Ct.

Inspection Conducted: December 28-30, 1982

Inspectors: P. Clemons 1/20/83
P. Clemons, Radiation Specialist date

Approved by: M. Shanbaky 1/27/83
M. Shanbaky, Chief, Facilities Radiation date
Protection Section, Radiation Protection
Branch

Inspection Summary: Inspection on December 28-30, 1982 (Report Nos. 50-245/82-24 and 50-336/82-26)

Area inspected: Routine, unannounced safety inspection by a regional based inspector of transportation activities including: audits, training, procedures, and field inspection. The inspection involved 20 inspector-hours on-site by one regional based inspector.

Results: One violation was identified: Failure to perform annual audit (Paragraph 3).

DETAILS

1. Persons Contacted

Mr. F. Dacimo, Quality Services Supervisor
Mr. E. Farrell, Station Services Superintendent
Mr. B. Granados, Health Physics Supervisor
Mr. R. Hebert, Superintendent, Unit I
Mr. V. Papadopoli, Quality Assurance Supervisor

NRC

Mr. D. Lipinski, Resident Inspector

The inspector also interviewed a Health Physics Supervisor, Health Physics Technicians, Quality Control Personnel, and an Operations Assistant.

2. Field Inspection

On December 28, 1982, a tour of the radioactive waste handling facilities was conducted to determine if any waste handling activities were in progress. The areas visited were the Unit I Compacting area and Units I and II solidification areas. The licensee was not packaging radioactive material during this inspection. In the Unit I waste handling area it was noted that the licensee is using 4' x 4' x 8' metal boxes to dispose of the low level compactable and/or the low level non-compactable radioactive material generated in Units I and II.

No violations were identified.

3. Audits

On December 29, 1982, it was determined that several audits of Health Physics - Radioactive Material Transportation activities had been performed during the first three calendar quarters of 1982 by various quality assurance groups. It was also determined that none of the audits conducted addressed the criteria of 10 CFR 50, Appendix B.

On May 15, 1979, Northeast Nuclear Energy Company submitted an application to the Nuclear Regulatory Commission for a quality assurance program for transportation packages for radioactive material. An approval was issued by the Commission, Approval No. 0208, on May 30, 1979 and it stated, "This approval is issued to satisfy the requirements of Section 71.51 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below."

Condition No. 6 of Approval No. 0208 stated, "Activities conducted under applicable criteria of Appendix B of 10 CFR Part 50 to be executed with regard to transportation packages by August 1, 1979."

Criterion 18 of the Northeast Utilities Quality Assurance Topical Report, NU-QA-1 requires, "annual audits of the 18 criteria of Appendix B to 10 CFR, Part 50".

Failure to perform an audit during 1982 of the applicable criteria of Appendix B, 10 CFR 50 with regard to transportation packages represents a violation of 10 CFR 71.51 (82-24-01; 82-26-01).

Interviews with available licensee representatives indicated that the appropriate audit had not been conducted since the approval was issued on May 30, 1979.

4. Procedures

Technical Specifications in Section 6.8, "Procedures" states in part:

"6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972."

"6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the PORC/SORC and approved by the Unit/Station Superintendent prior to implementation and reviewed periodically as set forth in each document."

Appendix "A" of Regulatory Guide 1.33, November, 1972, states, among other recommendations, that the following should be covered by written procedures:

"G. Procedures for Control of Radioactivity...

2. Solid Waste System

- a. Spent resins and filter sludge handling..."

The licensee transports spent resin for burial therefore Procedure No. OP313, Revision 6, "Transfer/Solidification of Spent Resin or Filter Sludge to Chem-Nuclear Portable Solidification Unit, and Dewatering Resin", developed pursuant to the above, was reviewed. The procedure had been approved by the PORC and the Unit I Superintendent.

No violations were identified.

5. Training

On August 10, 1979, IE Bulletin 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial". Item 5 of the Bulletin read as follows:

"Provide training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements, and in your instructions and operating procedures for all personnel involved in the transfer, packaging and transport of radioactive material. Maintain a record of training dates, attendees and subject material for future inspections by NRC personnel".

The licensee responded on September 19, 1979, as follows: "A program of training and retraining presently exists. A review of the program against the bulletin will be made and the program revised, if required, by January 1, 1980".

During this inspection, a Health Physics technician and a Quality Control inspector, both individuals significantly involved with transportation activities, were asked what training had they had received in DOT and NRC regulatory requirements, and waste burial license requirements. Both stated they had received no formal training. Both individuals had been employed in their present assignments more than six months.

The Training Director, new in the position, was asked what records were available to verify that the training had been provided. The Training Director did not have the supporting documentation. Apparently the commitment to IE Bulletin 79-19 was not completed.

The inspector discussed with the licensee representatives the apparent lack of an adequate training program for individuals involved in radioactive waste material packaging and transportation. The licensee stated that a training program covering this area was developed. The inspector reviewed an outline of the newly developed training program for Radioactive Waste technicians and determined that the program appeared to be adequate to satisfy the requirements of Item 5 in IE Bulletin 79-19. The Station Services Superintendent stated that the new training program would be started during January 1983 (82-24-02; 82-26-02).

No violations were identified.

6. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on December 30, 1982. The inspector summarized the purpose and scope of the inspection, and the inspection findings.