

QUALITY ASSURANCE AUDIT REPORT

AUDIT NO. 70-90-3 AUDIT DATES: Oct. 29 - Nov. 21, 1990

DEPARTMENT AUDITED: Health and Safety

SUBJECT: Annual Audit of LACBWR Environmental Monitoring Program

LEAD AUDITOR: D. Egge

AUDITOR(S): T. Sprester

INDIVIDUALS CONTACTED FOR:

AUDIT

POST AUDIT CONFERENCE

L. Nelson

L. NELSON 12/19/90

- ALL ITEMS ACCEPTABLE
- OPEN ITEM AS INDICATED IN REPORT
- NCR ATTACHED

LEAD AUDITOR: *[Signature]* DATE: 12/19/90

APPROVED BY: *[Signature]* DATE: 12-21-90
QA DIRECTOR

REVIEWED FOR COMMENT: *[Signature]* DATE: 12/30/90
PLANT MANAGER *dr.*

- DISTRIBUTION:
- GENERAL MANAGER
 - ASST. GENERAL MANAGER - OPERATIONS
 - SAFETY REVIEW COMMITTEE
 - ADMINISTRATIVE ASSISTANT
 - PLANT AUDIT FILE (T.L.)
 - QA AUDIT FILE (Orig.)

12/30/90
Long plan respnshy
1/10/91 Thule
John [Signature]

ENVIRONMENTAL PROGRAM AUDIT CHECKLIST

1. Are any items open from previous audits? Yes No
2. Are samples collected at required locations and frequencies in accordance with HSP-3.1? Yes No
3. Are the sample collection logs and forms completed in accordance with HSP-3.4? Are completed sample collection logs and forms receiving H&S management reviews in accordance with HSP-3.1? Yes No
4. Are all environmental procedures used current and up-to-date? Yes No
5. Are Technical Specifications and procedures consistent with each other and are Appendix I Technical Specifications being met? Yes No
6. Are gaseous and liquid effluents monitored, controlled and recorded per Technical Specifications and procedures? Yes No
7. Are standards used for analysis traceable to National Standards? Yes No
8. Are records maintained in accordance with LACBWR QA Program? Yes No
9. Is the interlaboratory comparison program implemented and conducted in accordance with HSP-2.13? Yes No
10. Does the DPC corporate office Environmental Department receive LACBWR environmental monitoring results for review? Yes No
11. Are results reviewed regularly? Yes No
12. Are State results compared with LACBWR results? Yes No
13. Are off-site doses being calculated per the ODCM? Yes No
14. Is the Process Control Program implemented and conducted at LACBWR? Yes No

CHECKLIST REMARKS

1. There are no open items from previous audits.
- 2/3 The H.P. Technicians are collecting the various samples at the required locations and frequencies per HSP-03.1. Those samples taken, logged and analyzed include airborne particulates, direct radiation TLD chips, waterborne (river), earth (shoreline silt), and ingestion samples from fish, milk and vegetation.

The semi-annual effluent report is being reviewed by the Reactor Engineer in the interim until a Radiation Protection Engineer is hired.

The completed data sheets are reviewed by the Health and Safety Supervisor.

Open Item: "A" Health and Safety management does review and initial data sheets, yet does not date the initials so as to determine whether reviews are done monthly.

This is required in HSP-03.1, Section 3.2.

4. All environmental monitoring program procedures are current. The following procedures were reviewed as part of this audit:
 - HSP-02.13 "Interlaboratory Comparisons Program for Environmental and Radiochemistry Analysis".
 - HSP-03.1 "LACBWR Environmental Monitoring Program".
 - HSP-03.3 "LACBWR Environmental Monitoring Program-Sample Collection".
 - HSP-03.4 "LACBWR Environmental Monitoring Program-Sample Preparation, Analysis and Data Review".
 - HSP-04.1 "Disposal of Spent Resin/Filter Media as Radioactive Waste Using a Hittman High Integrity Liner".
 - HSP-04.2 "Disposal of Dry Active Waste".
 - HSP-04.3 "Shipment of Radioactive Material to a Licensed Handler".
 - HSP-04.5 "Changing of FESW, Seal Injection Suction, Shield Cooling, or Other Highly Radioactive System Filters".
 - HSP-04.11 "Decontamination and Disposal of Used Oil".
 - HSP-12.1 "Semi-Annual Effluent Report".
 - HSP-12.3 "Gaseous Waste Records".
 - ACP-70.1 "Liquid Waste Batch Form Use".
5. LACBWR Environmental Monitoring Technical Specifications and procedures and 10 CFR 50, Appendix I, were all reviewed for consistency.

No areas of concern or inconsistencies were noticed during the review.

6. A review of 1989-1990 records of the semi-annual Effluent Report, sping calibrations and liquid waste dump sheets was conducted. All gaseous and liquid effluents appear to be controlled, monitored and recorded per LACBWR Technical Specifications and Procedures. No deficiencies were noted.
7. Standards used in environmental monitoring program calibrations and analysis were found to be traceable to national standards and therefore were acceptable. No areas of concern were noted.
8. During the course of this audit, records of environmental monitoring activities were found to be properly maintained per LACBWR's QA program requirements. No concerns were noted.
9. The Environmental Monitoring Interlaboratory Comparison Program was reviewed. LACBWR Environmental Lab results are currently being compared with EPA standards. The LACBWR results showed good agreement with the EPA, except for two areas. The two areas outside of EPA standards were Tritium analysis which was high and in the gamma isotopic analysis where Cobalt was an outlier. These two areas were reviewed by the Health and Safety group as much as possible and will be reviewed again during the next comparison. The program is being implemented according to the requirements and schedule set forth in HSP-02.13. No areas of concern were noted.
- 10/11 The External Relations Director (Environmental) receives the Effluent Reports that are issued by LACBWR for his review. LACBWR Environmental Monitoring Procedures also are reviewed by the External Relations Department. These reports and procedures are reviewed at regular intervals. No areas of concern were noted.
12. State of Wisconsin and LACBWR environmental samples are compared per the intervals in HSP-03.1. Included in the comparisons are samples of air particulate, air radioiodine, river surface water, milk, fish, and river sediment. No major discrepancies were noted in the comparisons and no deficiencies or areas of concern were noted.
13. Offsite doses are being calculated for the ODCM on a monthly basis. These calculations are compared with actual TLD measurements in the annual environmental report. No areas of concern were noted.
14. LACBWR has made two solid radwaste shipments since the implementation of their Process Control Program. One barrel shipment was made in November, 1989 and four tanks were shipped in October, 1989. Both shipments were to Quadrex. Records of the shipments were reviewed and it appears that the Process Control program is being followed properly. No areas of concern were noted.