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March 4, 1983

• United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Attn: Mr. Thomas T. Martin  
Division of Engineering and Technical Programs  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
IE Inspection Report No. 83-02

Gentlemen:

In response to your letter of February 18, 1983, and in accordance with 10 CFR 2.201, the attached reply addresses Notice of Violation which was included as Appendix A with the referenced Inspection Report.

If you have any questions concerning this response, please contact my office.

Very truly yours,

S. J. Carey  
Vice President, Nuclear

Attachment

cc: Mr. W. M. Troskoski, Resident Inspector  
U. S. Nuclear Regulatory Commission  
Beaver Valley Power Station  
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, DC 20555

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DUQUESNE LIGHT COMPANY  
Beaver Valley Power Station  
Unit No. 1

Reply to Notice of Violation  
Inspection 83-02  
Letter dated February 18, 1983

VIOLATION (Severity Level IV, Supplement V.D.2)

Description of Violation (83-02-01)

10 CFR 30.41 prohibits transfer of byproduct material unless it is in a form authorized by the recipient's NRC or Agreement State License. South Carolina License No. 097, an Agreement State license issued to Chem-Nuclear Systems, Inc., prohibits the receipt of solidified waste with "detectable free standing liquid" which is defined in the license as liquid in excess of 0.5 percent by waste volume per container.

Contrary to the above, on or about November 24, 1982, a waste shipment of byproduct material, containing 1.414 Curies of solidified resin and compacted trash, was transferred to Chem-Nuclear Systems, Inc. at Barnwell, South Carolina with detectable free standing liquid, 7.3 percent liquid by waste volume, in a container.

Corrective Action Taken

When notified of the violation, by the Licensee/Operator of the Barnwell, South Carolina burial site, the following actions were taken:

- a. Radwaste drumming operations were stopped until Radcon and Operations supervision could determine appropriate preventative/corrective actions to prevent recurrence.
- b. All radwaste containers in storage were opened to verify the contents and ensure there were no free standing liquids.
- c. The Radcon Procedure for drumming of solid waste was revised to require the contents of all drums be verified, by signature, by supervision. The procedure provides a format for this documentation. In addition, the procedure specifies that all radwaste must be in solid form and no free standing liquids (water or oil) are permitted. All drums will be marked to facilitate traceability.

The above-noted actions have resulted in documented administrative control of radwaste drumming operations.

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Action Taken To Prevent Recurrence

The implementation of the Radcon procedure revisions and supervisory surveillance of all drumming operations should preclude recurrence of this violation.

Date Upon Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.