

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA STREET, N.W., SUITE 2900 ATLANTA, GEORGIA 30323-0199

Report Nos.: 50-369/95-21 and 50-370/95-21

Licensee: Duke Power Company

422 South Church Street Charlotte, NC 28242

Docket Nos.: 50-369 and 50-370

License Nos.: NPF-9 and NPF-17

Facility Name: McGuire 1 and 2

Inspection Conducted: July 24-28, 1995

Inspector: W W Jones

Accompanied by: B. A. Parker

Approved by: IR Ocker, Chief

8/22/95 Date Signed

Radiological Effluents and Chemistry Section

Radiological Protection and Emergency Preparedness Branch

Division of Radiation Safety and Safeguards

SUMMARY

Scope:

This routine, announced inspection was conducted in the areas of transportation of radioactive material, radiological environmental monitoring, radioactive effluent controls, audits, and followup on previously identified issues.

Results:

In the areas inspected, violations or deviations were not identified.

The licensee had implemented effective quality assurance and management control programs for packaging, preparation, and transport of radioactive material. No transportation incidents have occurred during the last three years which involved the licensee's shipments of radioactive material (Paragraph 2).

The licensee had complied with the sampling, analytical, and reporting requirements for the radiological environmental monitoring program. Decreasing the frequency of sampling equipment malfunctions was identified as an area in which performance could be improved. The program results for 1994 indicated that the contribution to the radioactivity in the environment resulting from plant operations was slight. The licensee's program data were also consistent with the results from the independent monitoring program administered by the Radiation Protection Division of the North Carolina Department of Environment, Health, and Natural Resources (Paragraphs 3 and 5).

The licensee's overall performance in the EPA interlaboratory comparison program indicated that an effective quality assurance program had been maintained for analysis of environmental samples (Paragraph 4).

The licensee had implemented and maintained an effective program to monitor and control liquid and gaseous radioactive effluents. The projected offsite doses resulting from those effluents were well within the limits specified in the Final Safety Analysis Report and 40 CFR 190 (Paragraph 6).

The licensee had complied with the program requirements delineated in the Technical Specifications for conducting audits of station activities (Paragraph 7).

REPORT DETAILS

Persons Contacted

Licensee Employees

t*B. Byrum, Manager, Radiation Protection

J. Corell, Supervisor, Radiation Protection †*L. Criminger, General Supervisor, Radiation Protection

t*R. Cross, Specialist, Regulatory Compliance

*B. Dolan, Manager, Safety Assurance

*M. Geddie, Station Manager

*P. Herran, Manager, Engineering

G. Joinson, Scientist, Radiation Protection

*R. Michael, Manager, Chemistry

J. Pope, Scientist, Radiation Protection M. Ramseur, Supervisor, Radiation Protection

tK. Robinson, Supervisor, Chemistry

tB. Sherril, General Supervisor, Radiation Protection

*J. Snyder, Manager, Regulatory Compliance

Other licensee employees contacted included engineers, technicians, operators, and administrative personnel.

Nuclear Regulatory Commission

C. Harris, Resident Inspector

*G. Maxwell, Senior Resident Inspector

t*M. Sykes, Resident Inspector

tAttended entrance interview. *Attended exit interview.

Transportation of Radioactive Material (86750) 2.

> 10 CFR 71 established the requirements for packaging, preparation for shipment, and transportation of licensed material. 10 CFR 71.5 required the licensee to comply with the applicable requirements of the Department of Transportation (DOT) in 49 CFR Parts 170 through 189 when transporting licensed material outside of the confines of the plant or other place of use, or when delivering licensed material to a carrier for transport. 10 CFR 71 Subpart H established the quality assurance (QA) program requirements applicable to transportation of radioactive materials. 10 CFR 20.2006 and of Appendix F to 10 CFR 20 specified the requirements for control of transfers of radioactive waste intended for disposal at a land disposal facility and for establishing a manifest tracking system for those transfers. 10 CFR 61.55 and 61.56 established the requirements for classification and characterization of radioactive waste shipped to a near-surface disposal site.

a. Management Controls

10 CFR 71.103 required the licensee to establish a quality assurance program which clearly establishes and delineates in writing the authority and duties of persons and organizations performing safety-related functions of structures, systems, and components. The inspector reviewed section 17.3 of the "Duke Power Company Topical Report Quality Assurance Program, Duke-1-A" and determined that it identified the general organizational structure and functional responsibility assignments for implementing the QA program at the facility. Those functional responsibility assignments were further described and implemented through Section 5 of the facility "Radiation Protection Manual."

10 CFR 71.111 and 71.113 required the licensee to prescribe activities affecting quality by documented instructions, procedures, or drawings and to establish measures which assure that those documents, including changes thereto, were reviewed for adequacy and approved for release by authorized personnel. The inspector determined that the licensee's policy with regard to establishing, implementing, and control of procedures was described in Section 17.3.2.14 of the above referenced QA manual. Section 1D of the "Radiation Protection Manual" and Section 703.6 Nuclear System Directive 703, "Administrative Instructions for Station Procedures" provided specific requirements for review and approval of radiation protection procedures. The inspector reviewed selected licensee procedures applicable to shipment of radioactive material and determined that they provided adequate direction to perform the subject functions and had been approved for use by the Radiation Protection Manager in accordance with the above policy and procedures.

b. Quality Assurance Program

10 CFR 71.101(c) required the licensee to obtain NRC approval of the QA program prior to the use of any package for shipment of licensed material subject to 10 CFR 71 Subpart H. The inspector determined that the licensee's QA program "Duke Power Company Topical Report Quality Assurance Program, Duke-1-A" was approved by the NRC Office of Nuclear Material Safety and Safeguards via letter dated July 22, 1994.

NRC Certificate of Compliance (CoC) Packagings

10 CFR 71.12(c) required the licensee to maintain copies of certificates of compliance for NRC approved packages used for transport of radioactive material. The inspector verified that the licensee possessed a current copy of the CoC No. 9111 for a shielded cask routinely used to ship Low Specific Activity (LSA) radwaste offsite.

d. Registration of Use of NRC Approved Packages

10 CFR 71.12(c)(3) required the licensee to submit to the NRC, prior to the first use of an NRC approved package, the licensee's name and license number and the package identification number specified in the package approval. The inspector reviewed an NRC issued letter dated January 11, 1994, which indicated that the licensee was a registered user of the above cask used for shipments of LSA.

e. Preparation of Packages for Shipment

10 CFR 71.85 and 71.87 required the licensee to perform preliminary determinations, prior to the first use of any packaging, and routine determinations, prior to each shipment, that the packaging has no physical defects which could significantly reduce the effectiveness of the packaging and that the package meets the applicable packaging and license requirements. The inspector reviewed maintenance procedure MP/0/A/7550/10 "Chem-Nuclear Cask CNS 6-80-2 Lid Handling" and determined that it included provisions for quality control checks of the O-rings, seating surfaces, fasteners, lubricants, and other quality related attributes pertaining to the use of the cask. Radiation protection procedure HP/0/B/1004/04 "Preparation and Shipment of Radioactive Radwaste Filter Media" was also reviewed and found to include a checklist of items which must be verified as having been completed before releasing a package for shipment. That list included verification that the package was in an unimpaired physical condition. The inspector reviewed records of completed procedures for receipt and shipment of the above cask on June 28, 1995. Those records were generally adequate to perform the subject tasks and indicated that the required examinations had been performed.

f. Package Marking and Labeling and Vehicle Placarding

49 CFR 172.300, 172.400, and 172.500 required the licensee to mark and label each package of hazardous material offered for transport and to placard each vehicle used to transport hazardous material in the manner specified in 49 CFR 172 Subparts D, E, and F. 49 CFR 173.425(b) exempted packages containing LSA material from specified sections of the above marking and labeling requirements and specified that the packages be marked "Radioactive-LSA." The inspector reviewed procedures HP/0/B/1004/04 "Preparation and Shipment of Radioactive Radwaste Filter Media" and HP/0/B/1004/10 "Preparation and Shipment of Dry-Active Radwaste Materials," and found that they included checklists for verifying that packages had been marked and labeled and that vehicles had been placarded as required. The licensee's records for two recent shipments were reviewed and those records indicated that the packages had been appropriately marked and labeled and that the vehicles had been appropriately placarded.

g. Radiation Monitoring

10 CFR 71.47, 10 CFR 71.87(i) and (j), 49 CFR 173.441, 49 CFR 173.443 and 49 CFR 173.475(i) delineated the limits for external radiation levels and for removable surface contamination levels of packages offered for shipment. The inspector determined that procedures HP/0/B/1004/04 and HP/0/B/1004/10 included provisions for performing the required surveys and for assuring that the radiation and contamination limits were met for each package offered for shipment. The inspector reviewed the licensee's records for selected shipments of radioactive material and found that those records were complete and they indicated that the required surveys had been performed and the radiation and contamination limits had been met.

h. Shipping Paper Documentation

49 CFR 172.200 required the licensee to prepare shipping papers describing hazardous materials offered for transport in the manner specified in 49 CFR 172 Subpart C. 10 CFR 20.2006 required the licensee to prepare shipping manifests for each shipment of radioactive waste to a licensed land disposal facility such that they meet the requirements of Appendix F to 10 CFR 20. The inspector determined that procedures HP/0/B/1004/04 and HP/0/B/1004/10 included provisions for preparing shipping papers and manifests in accordance with the above requirements and for recording the required information on thereon. The inspector also reviewed the shipping papers for selected shipments of radioactive material and determined that they had been prepared in accordance with the above procedure. The inspector determined from the review that the shipment records selected for review were adequate to perform the subject function.

i. Drivers Instructions for Exclusive Use Shipments

49 CFR 173.425(b)(9) and 173.441(c) required the licensee to provide specific written instructions for maintenance of the exclusive use shipment controls to the carrier of packages of radioactive material consigned as exclusive use. Those instructions were required to be included with the shipping paper information. The inspector determined that procedures HP/0/B/1004/04 and HP/0/B/1004/10 included provisions for providing drivers with the required instructions and that the shipping papers for selected shipments included a copy of those instructions.

j. Advance Notifications

10 CFR 71.97 required the licensee to make prior notification to the governor of a state whenever specified packages and quantities of licensed material were being transported to, through, or across the State's boundaries to a disposal site. The inspector determined that Section 14.8 of the facility Radiation Protection Manual included provisions for making the required advance notifications and that the licensee's records for selected shipments included copies of the forms

used to make the required notifications.

k. Records

10 CFR 71.91 required the licensee to maintain records of each shipment of licensed material for a period of three years after shipment. The inspector reviewed selected shipping records and determined that the required information was being retained as required.

1. Radioactive Waste Classification and Characterization

10 CFR 20.2006(d) and Section III.A.l of Appendix F to 10 CFR 20 required the licensee to prepare all radioactive waste shipped to a licensed land disposal facility or waste collector such that the waste is classified according to 10 CFR 61.55 and meets the waste characteristics requirements in 10 CFR 61.56. The inspector reviewed selected shipping records and determined that the licensee classified and characterized waste shipments through the use of the RADMAN computer software. Radionuclide concentrations and physical description data for packaged waste were input to the computer and the program generated a manifest form. The printed manifest form included the information required to be included on waste manifests and the certifications that the waste had been properly classified, described, packaged, marked, and labeled and in proper condition for transport in accordance with applicable State and Federa regulations.

Based on the above reviews and observations, it was concluded that the licensee had implemented effective quality assurance and management control programs for packaging, preparation, and transport of radioactive material. No transportation incidents have occurred during the last three years which involved the licensee's shipments of radioactive material. All procedures reviewed appeared adequate to support the functions described.

No violations or deviations were identified.

Radiological Environmental Monitoring (84750)

Technical Specifications (TSs) 6.8.4.g for both units required the licensee to establish, implement, and maintain a program to monitor the radiation and radionuclides in the environs of the facility. The program was required to be described in Chapter 16 of the Final Safety Analysis Report (FSAR), conform to the guidance of Appendix I to 10 CFR Part 50, and include monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the Offsite Dose Calculation Manual (ODCM). The sampling locations, types of samples or measurements, sampling frequency, types and frequency of sample analysis, reporting levels, and analytical lower limits of detection (LLDs) were specified in FSAR Section 16.11-13. TSs 6.9.1.6 for both units and Section 16.11-16 of the FSAR delineated the requirements for submitting, the submittal dates, and the content of the Annual Radiological Environmental Operating

Reports. The reports were required to be submitted prior to May 1 of each year and to address the radiological environmental surveillance activities related to the plant during the previous calendar year. The reports were also required to include summaries, interpretations, and analyses of trends of the results from the Radiological Environmental Monitoring Program for the previous calendar year and to provide an assessment of the observed impact on the environment resulting from plant operations during the previous calendar year.

The inspector reviewed the licensee's Annual Radiological Environmental Operating Report for 1994 and discussed its content with the licensee. The report was submitted on April 18, 1995, and included the following: a description of the program, a summary and discussion of the results for each exposure pathway, analysis of trends and comparisons with previous years and preoperational studies, and an assessment of the impact on the environment resulting from plant operations. The report also included the results of the Land Use Census required by TS 6.8.4 g and FSAR Section 16.11-14, and the results of the Interlaboratory Comparison Program required by TS 6.8.4 g and FSAR Section 16.11-15. The following observations for the various exposure pathways were produced by the licensee's evaluation of the 1994 environmental monitoring program data and documented in the report or were identified by the inspector during the review of the report.

- Radiation dose estimates Dose estimates calculated from the environmental monitoring program data were generally lower than dose estimates calculated from effluent release data, which is indicative of the conservative methods used for calculating doses from effluents. Those calculated doses were a small percentage of their regulatory limits.
- Direct gamma radiation exposure The quarterly exposures for 1994, as measured by thermoluminescent dosimeters (TLDs), did not significantly differ from exposure rates observed during previous years of plant operation or during preoperational studies.
- Airborne No man-made radionuclides were detected by gamma isotopic analysis of the of the quarterly composites of air particulate filters. I-131 was not detected by gamma spectroscopy in any of the charcoal canisters used for adsorbing todine from the atmosphere.
- Surface and drinking water No man-made radionuclides were detected in the surface and drinking water samples collected during 1994.

- Shoreline sediment No man-made radionuclides were detected in the sediment samples collected from the control locations during 1994. Cs-137 was the only radionuclide detected in two of the four sediment samples collected from the indicator locations and the highest concentration observed was well below the required LLD.
- Milk No man-made radionuclides have been detected in any of the milk samples collected during the last four years.
- Fish No man-made radionuclides were detected in the fish samples collected from the control locations during 1994. Cs-137 was the only man-made radionuclide detected in the edible portion of the fish samples collected from 2 of the 6 indicator locations and the highest concentration observed was well below the required LLD.
- Vegetation and food products No man-made radionuclides were detected in the samples of vegetation and food products collected during 1994.
- No specified reporting levels for radioactivity concentrations in environmental samples were exceeded during the reporting period and the required analytical LLDs were achieved.
- During 1994 there were 31 deviations from the specified sampling plan, most of which were due to air and water sampling equipment malfunctions. Although such deviations were permitted by Footnote 1 to Table 16.11-7 in Section 16.11-13 of the FSAR, the inspector informed the licensee that decreasing the frequency of sampling equipment malfunctions was an area in which performance could be improved.
- The licensee's overall assessment of the environmental monitoring program results indicated that the contribution to the radioactivity in the environment resulting from plant operations was slight.

Based on the above reviews and discussions, it was concluded that the licensee had complied with the sampling, analytical and reporting program requirements and that the radiological environmental monitoring program was effectively implemented. Decreasing the frequency of sampling equipment malfunctions was identified as an area in which performance could be improved.

No violations or deviations were identified.

4. Environmental Monitoring Quality Assurance Program (84750)

TS 6.8.4 g and FSAR Section 16.11-15 required the licensee to participate in an interlaboratory comparison program and to include a summary of the program results in the Annual Radiological Environmental Operating Report. The licensee's report for 1994 provided a summary of the results from the licensee's participation in the EPA's Environmental Monitoring Systems Laboratory Intercomparison Program. The report also included descriptions of the various types of samples analyzed and the analyses performed, and an

evaluation of the analytical results. A total of 29 samples were analyzed and statistical evaluation of the program data indicated that the licensee's results were within the EPA control limits.

Based on the licensee's overall performance in the EPA crosscheck program it was concluded that an effective QA program had been maintained for analysis of environmental samples.

No violations or deviations were iden. ied.

5. State Radiological Environmental Monitoring (84750)

The State of North Carolina's Division of Radiation Protection (NCDRP), by contract with the NRC, independently monitors the concentrations of radioactivity in the environs of the licensee's facility and provides an annual report of the results from the monitoring program. The inspector reviewed the NCDRP's report for 1994 and discussed its content with the licensee. No anomalies were noted between the NCDRP's program data and the licensee's program data. The range of radioactivity concentrations and general trends observed by the NCDRP were comparable to the licensee's data.

6. Radioactive Effluent Controls (84750)

TSs 6.8.4.f for both units required the licensee to establish, implement, and maintain a program conforming with 10 CFR 50.36a for the control of radioactive effluents. The program was required to be described in Chapter 16 of the FSAR, to be implemented by operating procedures, and to include remedial actions to be taken whenever the program limits are exceeded. The program was also required to include, in part, the following elements: monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM; and limitations on the annual and quarterly doses to a member of the public from radioactive materials released in liquid and gaseous effluents from each unit conforming to Appendix I to 10 CFR Part 50. TSs 6.9.1.6 for both units and Section 16.11-16 of the FSAR described the reporting schedule and content requirements for the Annual Radioactive Effluent Release Reports. The reports were required to be submitted before May 1 of each year covering the operation of the facility during the previous calendar year. Prior to 1994, radioactive effluent release reports were required to be submitted on a semi-annual basis. Summaries of the quantities of radioactive liquid and gaseous effluents released from the facility and an assessment of the radiation doses due to those releases were required to be included in the reports.

The effluent data presented in Table 1 below were compiled from the licensee's effluent release reports for the years 1991, 1992, 1993, and 1994. The inspector reviewed the report for the year 1994 and discussed it's content and the data presented in Table 1 with the licensee. As shown in the table, there was a decrease in the amount of tritium released in liquid effluents during 1994. The licensee attributed that decrease to fewer leaks from the reactor

coolant system and a reduction in the volume of liquid radwaste discarded during 1994. The inspector compared the total volume of liquid effluents released from both units during 1993 and 1994. As indicated from the effluent release reports for those years, the total volume released had decreased by 3.8 million liters during 1994. There was a slight increase in the amount of activity released as fission gases in gaseous effluents during 1994. The licensee attributed that increase to the units having been operated longer at full power, and therefore more fission gases were produced. The inspector reviewed licensee records which indicated that the combined number of days the units were in outages during 1993 and 1994 was 247 and 140, respectively. Overall, the radiation doses from liquid and gaseous effluents released during 1994 were less than 2 and 4 percent of their respective annual limits. The report for 1994 was submitted on April 6, 1995, and indicated that there had been no unplanned releases or effluent monitors inoperable for more than 30 days during the reporting period.

Based on the above reviews, it was concluded that the licensee had implemented and maintained an effective program to monitor and control liquid and gaseous radioactive effluents. The projected offsite doses resulting from those effluents were well within the limits specified in the FSAR and 40 CFR 190.

No violations or deviations were identified.

Table 1

Effluent Release Summary for McGuire Units 1, and 2

Activity Released (curies)

Gaseous Effluents Liquid Effluents Fission and Dissolved Activation Noble Fission Products Particulates Tritium Tritium Gases Gases Iodines Year 1991 2.08 878 0.46 898 2.58E-3 8.20E-4 65 866 0.24 5.18E-3 4.68E-4 60 1992 0.65 810 0.57 83 1993 776 0.34 968 2.26E-3 1.14E-4 1994 0.62 480 0.25 1036 1.01E-3 6.14E-3 57

Annual Doses

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Year		al Body Dose mit: 3 mrem)	Percent of Limit	Maximum Organ Dose (Limit: 10 mrem)	Percent of Limit
1991	Unit Unit	0.13 0.13	4.3	0.21 0.21	2.1
1992	Unit Unit	0.04	1.3	0.08	0.8
1993	Unit Unit	0.04 0.04	1.3	0.05 0.05	0.5
1994	Unit Unit	0.05 0.05	1.7	0.06 0.06	0.6

Gaseous Effluents

Year		Lim	its: G	r Dose amma 10 mrad, eta 20 mrad)			Percent of
1991	Unit	1	Gamma		4.3 5.2	0.14	0.9
	Unit	2	Beta Gamma Beta	0.43	4.3 5.2	0.14	0.9
1992	Unit	1	Gamma Beta	0.65	6.5	0.16	1.1
	Unit	2	Gamma Beta	0.65	6.5 5.2	0.16	1.1
1993	Unit	1	Gamma Beta		4.7	0.13	0.9
	Unit	2	Gamma Beta	0.47	4.7	0.13	0.9
1994	Unit	1	Gamma Beta		3.4	0.08	0.5
	Unit	2	Gamma Beta	0.34	3.4	0.08	0.5

7. Audits (84750)

TSs 6.5.2.9 and 6.5.2.11.c required the licensee to perform audits of station activities, under the cognizance of the Nuclear Safety Review Board, and to forward the audit reports to licensee management within 30 days of completion of each audit. The audits were required to encompass, in part, the following: the conformance of station operation to provisions contained within the TSs and applicable facility operating license conditions; the performance, training and qualifications of the station staff; the ODCM and implementing procedures; the Radiological Environmental Monitoring Program and the results thereof; the Process Control Program (PCP) and implementing procedures for solidification of radioactive wastes; and the performance of activities required by the QA Program for effluent and environmental monitoring.

The inspector reviewed the reports for Departmental Audit NG-94-07(MG) and Regulatory Audit SA-95-21(MC)(RA), dated June 7, 1994 and May 2, 1995, respectively. The audits were conducted during the periods May 16-June 1, 1994, and April 3-20, 1995, respectively, by the licensee's Nuclear Assessment and Issues Division. The scope of the audits included an assessment of the chemistry and radiation protection program activities. The audited areas within those programs included, in part, personnel monitoring, respiratory protection, source control and leak tests, dose records, radioactive material control, transportation of radioactive material, environmental monitoring, ODCM and PCP procedures implementation, laboratory quality control, sampling and analysis of radioactive effluents, radioactive effluent release monitoring, analytical instrument calibration, TS required surveillances, personnel training and qualification, and corrective actions. A number of substantive issues were identified by the audits and were characterized as either findings, followup items, strengths, weaknesses, recommendations, or observations. Pursuant to the licensee's auditing procedures, the identified issues, including corrective actions for the findings, were tracked for completion of warranted follow-up actions through the licensee's Problem Investigation Process (PIP). The inspector determined that the audits were of sufficient scope and depth to identify existing problems and that corrective actions for the identified findings were documented and resolved through the PIP. The audit results were well documented and reported to facility management in a timely manner.

Based on the above reviews, it was concluded that the licensee had complied with the TS required program for conducting audits of station activities.

No violations or deviations were identified.

8. Followup on Previously Identified Issues (83750)

(Closed) Violation 94-02-04: Failure to implement and maintain packaging instructions in accordance with selected Certificate of Compliance (CoC) requirements. Followup on this issue was previously performed during an inspection conducted on September 12-16, 1994 (reference NRC Inspection Report Nos. 50-369, 370/94-21). During that inspection it was found that the licensee

had obtained a complete set of vendor technical manuals and had incorporated into most of their procedures the applicable portions of the manuals pertaining to bolt torque values. The CoC was also incorporated into the procedures and changes to correct the cask maintenance procedure were completed. While the cask maintenance procedures were reviewed against the latest revision of the CoC, the license realized that the cask maintenance procedures had not been reviewed against the portion of the vendor manual which contained the vendors maintenance procedure. During this inspection, the inspector reviewed cask Maintenance (lid handling) procedures MP/0/A/7550/11, MP/0/7550/13, MP/0/7550/16, and MP/0/7550/18, and determined that those procedures had been revised to incorporate the bolt tightening pattern and torque tolerances specified in the CoC. This item is closed.

9. Exit Interview

The inspection scope and results were summarized on July 28, 1995, with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed in detail the results listed above. No dissenting comments were received from the licensee. The licensee did not identify as proprietary any of the material provided to or reviewed by the inspector during this inspection.

Item Number	Status	Description and Reference		
50-369, 370/94-02-04	Closed	VIO - Failure to implement and maintain packaging instructions in accordance with selected CoC requirements (Paragraph 8).		