

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 84-14

Docket No. 50-247

License No. DPR-26

Priority --

Category C

Licensee: Consolidated Edison Company of New York, Inc.
4 Irving Place
New York, New York 10003

Facility Name: Indian Point Nuclear Generating Station, Unit 2

Inspection At: Buchanan, New York

Inspection Conducted: June 18-22, 1984

Inspectors: Richard K. Struckmeyer 7/20/84
for Rosemary T. Hogan Radiation Specialist date
Richard K. Struckmeyer 7/20/84
Richard K. Struckmeyer Radiation Specialist date
Approved by: Walter J. Pasciak 7/20/84
Walter J. Pasciak, Chief, Effluents Radiation Protection Section date

Inspection Summary:

Inspection on June 18-22, 1984 Inspection Report No. 50-247/84-14

Areas Inspected: Routine, unannounced safety inspection of transportation activities including: management controls, package selection, procedures, waste classification, indoctrination and training, audit program and recordkeeping. The inspection involved 62 inspection hours on-site by two region-based inspectors.

Results: Two violations were identified: (Severity Level V - failure to comply with the conditions of the Certificate of Compliance - paragraph 4; and Severity Level IV - failure to review and approve procedures - paragraph 6). One deviation was identified: (failure to train personnel involved in transportation activities - paragraph 9).

DETAILS

1. Persons Contacted

- * M. Blatt, Director, Regulatory Affairs
- E. Dadson, Manager, Procurement Quality Assurance
- A. Ferraro, Radiation Protection Training Administrator
- * H. Hoffman, Manager, Quality Assurance Audits
- * C. Jackson, Vice-President, Nuclear Power
- * D. Maffei, Radwaste Supervisor
- * D. McClahey, Emergency Planning Manager
- M. Miele, General Manager, Environmental Health and Safety
- F. Petschauer, Radwaste Supervisor
- * F. Phillips, Manager, Nuclear Power Quality Control
- B. Raskovic, Regulatory Affairs
- * T. Schmeiser, Radwaste Manager
- R. Vogle, Radiation Protection Supervisor

NRC

- * P. Koltay, Resident Inspector
 - * R. Struckmeyer, Radiation Specialist
- * Indicates those present at exit interview.

2. Licensee Action on Previous Findings

(Closed) Unresolved (247/83-05-01) Failed to audit QA program for packages. The licensee has conducted several audits in the area of transport packages. The licensee's action in this area appears to be adequate. (see paragraph 10)

(Closed) Violation (247/83-05-02) Failed to approve procedures. The licensee reviewed and approved all vendor procedures at the time of the previous inspection. New revisions issued since then have not been reviewed and approved according to procedure. (see paragraph 6)

3. Management Controls

The responsibility for the transportation of radioactive materials rests with the Radwaste Supervisors who report to the Vice-President of Nuclear Power through the Radwaste Manager and the General Manager of Environmental Health and Safety. The licensee has documented in procedures the specific responsibilities assigned to individuals and departments.

4. Selection of Packages

The licensee's program for use of packages was reviewed against the requirements of 10 CFR 71. Through review of records, including the Certificate of Compliance (C of C) it was determined that the licensee was not aware of new conditions of Certificate of Compliance No. 6601 for Chem

Nuclear Cask No. CNS 8-120. The conditions were added in a revision to the C of C dated March 2, 1984. Since that time, the licensee has made one Type B quantity shipment using that cask. The C of C conditions require that "prior to each shipment, the packaging must be leak tested ..." and "the external dose rate at 3 feet from the surface must not exceed 125 mrem/hr". The package was not leak tested nor was the dose rate determined by the licensee for the Type B quantity shipped on May 1, 1984. Failure to comply with the conditions of the Certificate of Compliance is a violation of 10 CFR 71.12(c). (84-14-01)

5. Procedures

Procedures for carrying out the various transport activities were reviewed. Included in packaging procedures were instructions for preparing the package for use, loading its contents, closing the package, and marking and labeling the package. Procedures for handling packages and shipment of radioactive material included acceptance criteria and regulatory limits where appropriate.

The licensee is in the process of revising the procedures to more clearly define responsibilities and more fully describe actual operations. The inspector noted that the old procedures did not clearly address receipt notification, waste classification labeling and shipment tracing. The licensee stated that these items would be addressed in the new procedures. The adequacy of the procedures is unresolved pending review of the new procedures when they are issued. (84-14-02)

6. Document Control

A program for document control is described in Procedure No. 2.010, "Environmental Health and Safety Department Procedure Preparation, Revisions and Controlled Distribution." The licensee has implemented the procedure for the Radiation Protection group but has not implemented it for the Radwaste group. Procedures describing radwaste activities should be reviewed for adequacy, approved for release by authorized personnel, and distributed and used at the location where the prescribed activities are performed. An approved and controlled list of addresses should receive the procedures and be assured of receiving all revisions to those procedures. Care should be taken to recall outdated or current procedures from persons who are no longer on the controlled list of addressees since those procedures are no longer controlled copies. The adequate implementation of Procedure No. 2.010 for Radwaste procedures is unresolved. The licensee's document control program will be reviewed when the new Radwaste procedure series is issued. (84-14-03)

Within the scope of this review the following violation was identified: Technical Specification 6.8.2 requires each procedure that meets or exceeds the requirements and recommendation of Sections 5.1 and 5.3 of ANSI 18.7-1972, and Appendix "A" of USAEC Regulatory Guide 1.33 be reviewed and approved for implementation in accordance with a written administrative control procedure approved by the appropriate General Manager, and with the concur-

rence of the Station Nuclear Safety Committee and the Nuclear Facilities Safety Committee.

It was determined that the current revision of the handling procedure for Cask CNS 8-120 had been implemented and the procedure was not reviewed and approved for implementation in accordance with a written administrative control procedure approved by the appropriate General Manager, and with the concurrence of the Station Nuclear Safety Committee and the Nuclear Facilities Safety Committee. This violation has previously occurred. The licensee's corrective action resulted in the previous revision being properly reviewed and approved, however, the licensee did not take appropriate action to prevent recurrence. Failure to review and approve procedures prior to implementation by appropriate licensee representatives constitutes a violation of Technical Specification 6.8, "Procedures". (84-14-04)

7. Waste Manifests

The inspector reviewed the licensee's waste manifest form and preparation method. Each shipment of radwaste intended for off-site disposal to a licensed land burial facility is accompanied by a shipment manifest which includes all of the required information.

8. Waste Classification

The licensee's documentation of determination of scaling factors was reviewed to verify that a reasonable method was used to classify wastes. Vendors have analyzed the licensee's waste samples and determined scaling factors for all radionuclides which will be determined indirectly. The licensee intends to reanalyze and redetermine scaling factors for all waste types every six months. The licensee uses a computer program to calculate the radionuclide concentration in the waste.

Measured dose rates are used for dry activated waste and Ge (Li) gamma analysis results are used for resins, evaporator bottoms and sludges. For each waste shipment, the computer program uses the dose rates of the gamma results for that shipment and the predetermined scaling factors to calculate the activation product, fission product and transuranic radionuclide concentrations.

9. Training Program

The adequacy of the licensee's training program in the transportation area was determined by interviewing the Radiation Protection Training Administrator, the Radiation Protection Supervisor, the Radwaste Supervisor and the Managers of Nuclear Power QC and Procurement QA charged with the responsibility of inspection of transport activities.

Radwaste and Radiation Protection personnel are trained in the applicable NRC and DOT regulations, burial site criteria and the licensee's procedures. Retraining occurs on an annual basis. Quality Control Inspectors who inspect transport activities do not have a documented training and retraining program.

IE Bulletin No. 79-19 requires licensees to "provide training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements and in your (the licensee's) instructions and operating procedures for all personnel involved in the transfer, packaging and transport of radioactive material..." In the licensee's response to IE Bulletin No. 79-19, dated September 24, 1979, the licensee stated that training covering these areas would be implemented for all personnel involved in the transfer, packaging and transport of radioactive materials.

Failure to train employees involved in the inspection of the transport of radioactive material represents a deviation from licensee commitments to the NRC. (84-14-05)

10. Audit Program

The audit program was reviewed to assure that the program was sufficient to verify compliance with all aspects of the quality assurance program.

It was determined from review of the audits performed between December 1982 and December 1983 (Audits 83-03-H, 83-03-I, 83-03-J, and 83-03-K) that most aspects of the quality assurance program had been addressed. The practice of changing the checklist for each audit will assure that, over a period of several audits, all applicable criteria of the quality assurance program for transport packages will be reviewed. There were no findings in three of the audits and therefore no response was required. One audit completed June 8, 1983 was not responded to until November 17, 1983. The extended length of time between audit and response was discussed with the Manager, Quality Assurance Audits. The licensee has developed a tracking system for audit findings. The system is designed to alert both auditors and audit respondees of the status and deadline of responses. The licensee is in the process of using the system to follow-up on old audit findings which are delayed and new audit findings. The effectiveness of this new program in correcting audit findings will be reviewed in a future inspection. (84-14-06)

11. Recordkeeping

The inspector reviewed the records of selected radioactive material shipments made by the licensee during the period January 1983 through June 1984 for compliance with the requirements of 10 CFR 71.91, 10 CFR 61 and 10 CFR 20.311. Checklists were sufficient to assure that procedural and regulatory requirements were met. The shipping papers included all appropriate documents. The licensee retains all hand calculations and computer determinations made to determine waste classification. All shipping records are maintained by the licensee for a period exceeding two years.

12. Exit Interview

The inspector met with licensee representatives denoted in Paragraph 1 at the conclusion of the inspection on June 22, 1984. During this meeting the purpose and scope of the inspection were summarized and the inspection

findings were discussed. At no time during this inspection was written material provided to the licensee by the inspector.