

John D. O'Toole
Vice President

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Telephone (212) 460-2533

August 31, 1984

Re: Indian Point Unit No. 2
Docket No. 50-247

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

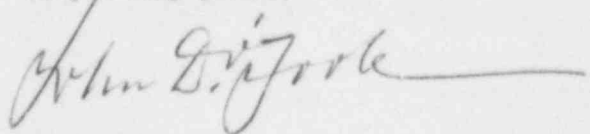
Dear Mr. Martin:

This refers to I.E. Inspection 50-247/84-14 conducted by Ms. R. T. Hogan of your office on June 18-22, 1984 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your August 1, 1984 letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation enclosed therewith as Appendix A. Our response to the items of non-compliance is presented in Attachment A to this letter.

Your letter also contains a Notice of Deviation. Our response to this Notice is presented in Attachment B to this letter.

Should you or your staff have any questions, please contact us.

Very truly yours,



cc: Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

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ATTACHMENT A

Response to Appendix A

Notice of Violation

50-247/84-14

VIOLATION A

10 CFR 71.12(c) requires that a person using a package to transport licensed material must have a copy of the Certificate of Compliance, and the person must also comply with the conditions of the Certificate.

1. Certificate of Compliance No. 6601, Revision No. 15, requires that prior to each shipment, the packaging must be leak tested in accordance with Section 8.2.2 of the application.

Contrary to the above, the licensee did not perform a leak test prior to the Type B quantity shipment of resin made on May 1, 1984 in a cask having the Certificate of Compliance No. 6601.

2. Certificate of Compliance No. 6601, Revision No. 15, requires that the external dose rate at 3 feet from the surface of the package not exceed 125 mrem/hr.

Contrary to the above, the licensee did not determine if a package shipped on May 1, 1984, having the Certificate of Compliance No. 6601, had an external dose rate at 3 feet not exceeding 125 mrem/hr.

This is a Severity Level IV violation (Supplement V)

RESPONSE

1. The pressure test required by Certificate of Compliance 6601 Rev. 15 was not conducted on May 1, 1984.

An inspection conducted at the burial site upon receipt of the shipment determined that there was no leakage into or out of the shipping cask. In addition, Chem Nuclear Systems Incorporated (CNSI) confirmed the required annual pressure test had been conducted.

In immediate response to this violation, Rad Waste supervisors were instructed in the requirements of this revised Certificate of Compliance.

To prevent recurrence of this event, a check-off list was incorporated in procedure EHS 4.303 "Shipping Cask Handling Procedure" to ensure the leak test is completed. This procedure was implemented on August 17, 1984.

2. Included as Attachment C is a copy of the survey of shipment 84-23W showing a 5 mr/hr dose rate at three feet. Additionally, a contact survey reading on the cask showed a reading of 35 mr/hr, which would preclude a dose at three feet of 125 mr/hr.

VIOLATION B

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

Contrary to the above, the licensee has implemented a transport package loading procedure and the procedure was not reviewed and approved for implementation in accordance with 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 is a Severity Level V violation (Supplement V)

RESPONSE

In immediate response to the above violation, the cask associated with the transport package loading procedure was immediately removed from use.

To prevent recurrence of this event, procedure EHS 4.303 "Shipping Cask Handling Procedure" was revised. It includes as addenda the above mentioned procedure and all pertinent vendor Cask Handling Procedures for containers used at Indian Point, including Certificates of Compliance and air leak test procedures. This procedure was reviewed and approved for implementation on August 17, 1984 in accordance with Station Administrative Order 102, a written administrative control procedure approved by the appropriate General Manager, and with the concurrence of SNSC and the Nuclear Facilities Safety Committee.

ATTACHMENT B

Response to Appendix B

Notice of Deviation

DEVIATION

IE Bulletin No. 79-19 states that licensees should "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 your response to IE Bulletin No. 79-19, dated September 24, 1979, you stated that "training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements, and instructions and operating procedures for all personnel involved in the transfer, packaging and transport of radioactive material will be implemented by March 1, 1980. A record of training dates attendees and subject material will be maintained."

Contrary to the above, Quality Control inspectors involved in the transport of radioactive materials have not been trained in DOT and NRC regulatory requirements, the waste burial license requirements and instructions and operating procedures.

RESPONSE

The QC Manager has reviewed from an operational and QC viewpoint the requirements, instructions and procedures discussed in the notice with the inspectors normally involved with radwaste inspections. Only the inspectors who have received this retraining will be assigned to radwaste shipments until a revised training program is implemented.

We have reviewed our records and found that since 1982, 189 inspections were performed by Quality Control (QC) using a checklist which QC helped develop based on DOT, NRC and waste burial license requirements. Two inspectors have performed 137 of the 189 inspections and thereby have the most experience in all QC aspects of Rad Waste Shipment at the site. As was explained to the NRC inspector, QC follows a checklist which verifies that certain visual checks are made of equipment, that radwaste procedures are followed, and that the information required, e.g., check sheets and calculations, are in the document package or are not required. The inspections and their scope have been designed so that the QC inspectors verify characteristics or attributes which demonstrate adherence to procedures and regulations referenced therein without examining every company action.

QA will review the existing QC checklist and radwaste transfer, packaging, and operating procedures to insure that adequate QC inspection points are included in existing inspection checklists. QC inspectors performing radwaste inspections will be trained to perform inspections to the revised checklist. QA is also reviewing CI-240-1 supplement 1 "Quality Assurance Program for Radioactive Material Packages, and Quality Control Requirements for Radioactive Waste Classification and Characterization (Form)" to assure it appropriately addresses the training concerns identified in the notice. QA/QC personnel involved in the inspection of the transport of radioactive material will complete formal training in the DOT, NRC regulatory requirements, and the waste burial license requirements by December 31, 1984.

To prevent recurrence of the deviation, requirements for the formal training and retraining of personnel will be incorporated into the QA Training Program. This will be accomplished by December 31, 1984.

