



Northern States Power Company

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Minneapolis, Minnesota 55401
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August 24, 1984

Mr C J Paperiello, Chief
Emergency Preparedness & Radiological
Protection Branch
799 Roosevelt Road
Glen Ellyn, Illinois 60137

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Response to Notice of Violation Identified in
Inspection Report No. 263/84-14 (DRSS)

This refers to the Notice of Violation issued by the Emergency Preparedness and Radiological Protection Branch, NRC, to Mr C E Larson, NSP, dated July 26, 1984. Pursuant to 10CFR 2.201, the following report is submitted:

In response to the Notice of Violation identified in the above report, NSP disagrees that 10CFR30.41 was violated. The U S Ecology, Inc. license, issued by the State of Washington, WM-1019-2, Section 27(A) states, in part, "U S Ecology, Inc. shall not receive any liquids that have not been absorbed or solidified. Freestanding liquid is not allowed to exceed 0.5% by volume." The Notice of Violation identified in Inspection Report No. 263/ 84-14 (DRSS) states in part that, "a package containing approximately 0.75% by volume free standing liquid was shipped from the Monticello Nuclear Generating Station and received at the US Ecology, Inc. Hanford, Washington burial site on April 19, 1984." Based on the amount of liquid (3 to 3-1/2 gallons) documented in U. S. Ecology's Certification of Material Receipt, (attached), we calculate the freestanding liquid associated with the referenced package to be less than 0.5%.

The NRC Inspection Report 84-03/15000046 referenced in the July 26, 1984 report and State of Washington supporting documents state in part, "The absorbed liquid was contained in a plastic liner then put into a drum. The drum reads 60 mr/hr on contact in spots." At Northern States Power's request, the referenced drum was reopened and inspected. The piece of pipe which had broken off the package was located and found to be reading 150 mr/hr. The drum with the absorbed liquid was found to be reading approximately 3 mr/hr with the pipe removed, not 60 mr/hr. The inspection report and associated documentation does not address this fact, but instead implies that the absorbed liquid was causing the drum to read 60 mr/hr.

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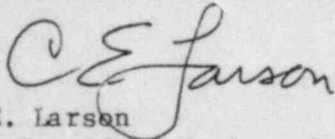
In addition, an NSP representative interviewed Washington State Inspectors Mike Elsen and Kelly Cameron, and U S Ecology employees Mike Nolan (Radiation Safety Officer) and A G Ford (Technician). All of the aforementioned personnel concurred that the 5 to 6 gallons initially referenced was a conservative overestimate and quantitative data to support it did not exist. This fact is substantiated by the attached letter from U S Ecology. Therefore, the quantity of liquid referenced in the attached documents associated with Inspection Report No. 84-03/15000046 cannot be substantiated.

To prevent a similar occurrence, Northern States Power Company has revised the master shipping procedures to include evaluation of any components which have the potential for containing or trapping liquid by a competent authority to ensure that those components are in compliance with shipping regulations.

Based on NSP's review of Inspection Report 84-03/15000046, State of Washington supporting documents, U S Ecology supporting documents, and on-site investigation at the Washington Burial Site, it is apparent that the information supplied to NRC Region III was inconclusive and questionable, therefore the withdrawal of citation in Inspection Report No. 263/84-14 is requested.

It should also be noted that the attached documentation was provided to both NRC Inspectors identified in Report No. 263/84-14 (DRSS) and that Northern States Power Company did not acknowledge the violation during the exit meeting as referenced in the inspection report.

Your consideration of this matter is greatly appreciated.



C. E. Larson
Vice President Nuclear Generation

CEL/LHW/slv


Enclosure

cc: J G Keppler
NRC Resident Inspector
NRC Project Manager
G Charnoff

USEcology

NORTHERN STATES POWER COMPANY
P.O. BOX # 600
MONTICELLO, MN 55362
ATTN: GLENN MATHIASSEN

This is to certify that the waste described below was received for disposal at the US Ecology Richland, Washington Low-Level Radioactive Waste Disposal Facility. This certification satisfies Conditions 31(a) and 31(b) (Acknowledgement of Receipt of Waste) of the State of Washington Radioactive Materials license WN-1019-2 issued to US Ecology.

BATES NUMBER 10610
GENERATOR NUMBER MNO 02-068-6139
MANIFEST NO. 29866
SHIPMENT NO. 84-65
DATE RECEIVED 4/19/84
SIGNATURE  DATE 4/19/84

Discrepancies (if any) between wastes listed on the manifest and waste materials received in the shipment:
approximately 3 to 3 1/2 gallons of liquid gushed out of HX-1 when a 1 in drain line broke off while offloading.

NOTE: Any inquiries to this acknowledgment should be directed to Mike Nolan, Facility Radiation Safety Officer.