



Pennsylvania Power & Light Company

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Bruce D. Kenyon
Vice President-Nuclear Operations
215/770-7502

SEP 28 1984

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

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORTS 50-387/84-31
AND 50-388/84-37
ER 100450 FILE 841-04
PLA-2320

Docket Nos. 50-387
50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of August 31, 1984, which forwarded NRC Region I Combined Inspection Reports 50-387/84-31 and 50-388/84-37 with Appendix A, Notice of Violation.

Your Notice advised that PP&L was to submit a written reply within thirty (30) days of the date of the letter. We trust that the Commission will find the attached response acceptable.

Very truly yours,

B. D. Kenyon
Vice President-Nuclear Operations

Attachments

cc: Mr. R. H. Jacobs - NRC Senior Resident Inspector
Mr. W. J. Pasciak - NRC Region I

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RESPONSE TO VIOLATION

Violation: (387/84-31-01 and 388/84-37-01)

10 CFR 71.5 prohibits delivery of licensed material to a carrier for transport unless the licensee complies with applicable regulations of the Department of Transportation in 49 CFR Parts 170-189. 49 CFR 173.425(b)(6) requires that packaged shipments of low specific activity material must be braced so as to prevent the shift of lading under conditions normally incident to transportation.

Contrary to the above, on June 27, 1984, licensed material, containing 1413.863 millicuries, identified as low specific activity, was delivered to a carrier for transport. Upon arrival at the burial facility in Richland, Washington, the shipment was found not to be braced so as to prevent the shift of lading under conditions normally incident to transportation.

Response:

(1) Corrective steps which have been taken and the results achieved:

Upon notification by the State of Washington, PP&L initiated a review of procedures and activities associated with the items of non-compliance and the corrective actions were:

- (a) A letter was sent to the State of Washington, Department of Social and Health Services assuring them that corrective actions identified would be initiated immediately for future full compliance with all applicable state and federal regulations.
- (b) A corrected copy of the State of Washington Certification Form which showed the waste volume units of the radwaste shipment was sent to the State of Washington.
- (c) The Quality Control Inspection Checklist for shipment of radwaste has been revised to include verification that bracing and spacer material is adequately secured on the vehicle.
- (d) A training session was held with QC Inspectors of radwaste activities to review the items of non-compliance and to familiarize them with the resolution to the bracing failure.
- (e) The Health Physics procedure for loading a transportation vehicle with drums has been revised to specifically address the securing of spacers that are used between the containers and the bracing.

(2) Corrective steps being taken to avoid further violations:

The cause of the bracing failure is indeterminate in that adequate shipping measures were taken prior to the shipment leaving the site. The training department has included this particular incident into Radwaste Worker Training to enhance the importance of bracing in radwaste shipments.

No further actions apart from those in 1 above need be accomplished.

(3) Date of Full Compliance:

Based upon the action in 1 above, PP&L is in full compliance.