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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

September 26, 1984

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

ATTENTION: Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs

Gentlemen:

This refers to Inspection Report 50-317/84-20, 50-318/84-20; which transmitted one item of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to that item noted in your letter of August 28, 1984.

Should you have further questions regarding this reply, we will be pleased to discuss them with you.

Very truly yours,

AEL/LOW/tlm

Enclosure

cc: D. A. Brune, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
T. Foley, NRC

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ENCLOSURE (1)

**REPLY TO APPENDIX A OF NRC INSPECTION
REPORT 50-317/84-20; 50-318/84-20**

We have reviewed the circumstances that led to the apparent violation of 10 CFR 71.101(b), "Quality Assurance Requirements", requiring each licensee to establish a Quality Assurance Program for transport packages in accordance with the applicable criteria of 10 CFR 50, Appendix B. This inspection report indicated that we failed to comply with 10 CFR 50, Appendix B, Criterion X, requiring the licensee to establish a receipt inspection program for radioactive material transport packages and 10 CFR 50, Appendix B, Criterion II, requiring that the licensee identify the structures, systems, and components to be covered by a Quality Assurance Program. Accordingly, the corrective action cited below has been or will be implemented to ensure that similar violations will not occur in the future.

Transport packages used for shipments of radioactive waste have always been inspected for compliance with transportation and burial site criteria prior to use. These inspections have been conducted by qualified personnel under the direction of the Supervisor-Materials Processing and verified by Quality Control personnel. In addition, receipt inspections of High Integrity Containers and shielded shipping casks are now documented in accordance with established Company procedures for receiving safety-related material.

Quality Assurance Procedure (QAP)-3, Radioactive Waste, has always stated that radioactive waste activities, including those involving rad-waste package materials, must be controlled. This procedure lists the responsibilities, lower level procedures, and training requirements that are needed to implement a radioactive material package program. To resolve any ambiguities, QAP-3 and other associated procedures will be revised by October 1, 1985, to more clearly state how radioactive waste material packaging is to be controlled.

As an interim measure, personnel responsible for radioactive waste material packaging have been reinstructed to use applicable 10 CFR 50, Appendix B, criteria when processing radioactive waste material packages.