

APPENDIX A

NOTICE OF VIOLATION

Duquesne Light Company
Beaver Valley Power Station, Unit 1

Docket No. 50-334
License No. DPR-66

As a result of the inspection conducted on December 17-21, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

1. 10 CFR 20.311(d)(3), "Transfer for disposal and manifests", requires the licensee to "conduct a quality control program to assure compliance with 61.55 and 61.56 of this chapter"...

10 CFR 61.55 and 61.56 requires, in part, that solid waste shall not contain free standing liquid greater than 1% of the waste volume, and the waste be properly classified and have structural stability.

Contrary to the above, on October 29, 1984, the licensee shipped 17.5 Curies of solidified licensed material to a waste burial site and the licensee did not conduct a quality control program to assure that the package did not contain free standing liquids greater than 1% of the waste volume; that the waste was properly classified; and that the waste was structurally stable.

This is a Severity Level IV violation (Supplement IV).

2. 10 CFR 71.101(b) "Quality assurance requirements", requires that each licensee shall establish, maintain, and execute a quality assurance program for transport packages satisfying each of the applicable criteria of this subpart. 10 CFR 71.101(f) states, a Commission-approved quality assurance program which satisfied the applicable criteria of Appendix B of Part 50 of this chapter and which is established, maintained, and executed with regard to transport packages will be accepted as satisfying the requirements of paragraph (b) of this section.

A Commission approved QA program, pursuant to 10 CFR 50, Appendix B, was adopted as applicable to transport packages.

Criterion XVIII, "Audits", of Appendix B, Part 50 requires that a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program for transport packages and to determine the effectiveness of the program.

Contrary to the above, during 1983 and 1984 the licensee has not performed a comprehensive system of planned and periodic audits to verify compliance with applicable criteria of the quality assurance program for transport packages, such as Criteria I, II, IV, VI, X, XII and XVII.

The two audits performed during 1983 and 1984 were only confined to Criterion V, "Instructions, Procedures and Drawings".

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Duquesne Light Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.