

OCT 17 1984

Docket Nos. 50-387  
50-388

Pennsylvania Power & Light Company  
ATTN: Mr. Bruce D. Kenyon  
Vice President  
Nuclear Operations  
2 North Ninth Street  
Allentown, Pennsylvania 18101

Gentlemen:

Subject: Inspection Nos. 50-387/84-31; 50-388/84-37

This refers to your letter dated September 28, 1984, in response to our letter dated August 31, 1984.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

*R. BELLAMY*

*J. T.* Thomas T. Martin, Director  
Division of Engineering and  
Technical Programs

cc:

Norman W. Curtis, Vice President, Engineering and Construction - Nuclear  
A. R. Sabol, Manager, Nuclear Quality Assurance  
W. E. Barberich, Licensing Engineer  
H. W. Keiser, Superintendent of Plant  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

bcc:

Region I Docket Room (with concurrences)  
Senior Operations Officer  
DPRP Section Chief  
J. Grant, DPRP

*mm*  
RI:DETP  
Hogart/cjm  
10/11/84

*UP*  
RI:DETP  
Pasciak  
12/15/84

*mm*  
RI:DETP  
Bellamy  
10/11

*mm*  
RI:DETP  
Martin

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PDR



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

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

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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 1

AN

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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.