

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-286/84-19

Docket No. 50-286

License No. DPR-64

Priority --

Category C

Licensee: New York Power Authority
P. O. Box 215
Buchanan, New York 10511

Facility Name: Indian Point Unit 3

Inspection At: Buchanan, New York

Inspection Conducted: August 6-10, 1984

Inspectors: P. Clemons
P. Clemons, Radiation Specialist

10/1/84
date

Approved by: Donald Bellamy
M. Shanbaky, Chief, Facilities
Radiation Protection Section

10/3/84
date

Inspection Summary: Inspection on August 6-10, 1984 (50-286/84-19)

Areas Inspected: Routine, unannounced safety inspection by one region-based inspector of transportation activities, including: purpose, outstanding items, shipment manifests, management controls, procedures, quality assurance, shipments of radioactive material, record keeping, selection of packages, Part 61 and training. The inspection involved 32 inspector hours on-site by one-region based inspector.

Results: One violation was identified (failure to maintain records and conduct audits for transport packages, paragraph 5).

DETAILS

1. Persons Contacted

1.1 License Personnel

J. Brons, Resident Manager
W. Hamlin, Assistant to Resident Manager
J. Russell, Superintendent of Power
J. Cirilli, Quality Assurance Superintendent
R. Allen, Training Superintendent
D. Quinn, Senior Radiological Engineer
R. Deschamps, General Health Physics Supervisor
W. Greenman, Rad Waste Supervisor
A. Burger, Rad Waste Foreman

1.2 NRC Personnel

L. Rossbach, Resident Inspector
D. Limroth, Project Engineer

Other licensee personnel were contacted and interviewed during this inspection.

2. Purpose

The purpose of this routine inspection was to review the licensee's transportation activities with respect to the following elements:

- Review of outstanding items;
- Review of management control;
- Review of procedures;
- Review of quality assurance;
- Review of shipments of radioactive material;
- Review of selection of packages;
- Review of Part 61 compliance; and
- Review of training.

3. Status of Previously Identified Items

(Closed) Inspector Followup Item (286/84-03-01). Review practical factors survey training for Nuclear Plant Operators. Indoctrination and Training

Procedure 15-10, Revision 11 dated 5/19/84 "Training for Nuclear Plant Operators (Non Licensed Operators)" was reviewed and it had been revised to require that a Health Physics Representative sign a form indicating that the Representative had observed the Nuclear Plant Operators performing a general area and contact radiation survey.

(Closed) Inspector Followup Item (286/84-03-02). Review procedure for skin dose calculation from skin contamination. Procedure HPI 6.41 Revision 4, "Personnel Decontamination" dated 8/9/84 that was revised for skin dose calculation from skin contamination was reviewed and it appeared to be adequate.

4. Management Control

The licensee has documented the management control for radioactive waste control in Procedure AP-24 Rev. 2, "Conduct of Radiological and Environmental Services".

The Radiological and Environmental Services Superintendent has the overall responsibility for the program. The Health Physics General Supervisor supervises all radioactive waste control, with the Senior Radiological Engineer providing technical expertise in waste packaging and transportation.

5. Quality Assurance Program

The adequacy and effectiveness of the licensee's quality assurance program were reviewed against the criteria contained in 10 CFR 71.101, "Quality Assurance Requirements". The licensee's performance relative to these criteria was determined by interviewing the Quality Assurance Superintendent, Quality Assurance Engineers, and the Rad Waste supervisor.

Within the scope of this review, the following violation was identified:

10 CFR 71.101(b) requires each licensee to establish a quality assurance program for packages. 10 CFR 71.101(f) states that a Commission approved quality assurance program that satisfies 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.

Criterion XVII, Appendix B, Part 50, "Quality Assurance Records", of the licensee's previously approved program requires that the licensee maintain sufficient records to furnish evidence of activities affecting quality.

Criterion XVIII, Appendix B, Part 50, "Audits", of the licensee's previously approved program 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.

It was determined by interviewing the Rad Waste Supervisor that preventive maintenance activities were performed on transport package Model No. NUPAC 14D-2.0 in December, 1983, a package owned by the licensee. The annual maintenance activities were performed as required by Procedure No. PE-RWI-9.9, "Annual Inspection of NUPAC 14D-2.0".

The records of these activities were reviewed. The records supported the fact that a leak test had been performed, and that the primary gasket had been changed. There was no documentation to support the fact that the secondary gasket had been changed, and neither was there documentation to support the fact that the various package lubricant requirements had been done.

It was also determined by interviewing the Quality Assurance Superintendent and a Quality Assurance Engineer that planned and periodic audits have not been carried out to verify compliance with all aspects of the quality assurance program for transport packages. Apparently such audits have not been performed since 1979. The licensee has assumed that their generic quality assurance program satisfies the quality assurance requirements for transport packages. 10 CFR 71.101(f) clearly states that an approved quality assurance program that satisfies the applicable criteria of Appendix B of Part 50 and which is established, maintained, and executed with regard to transport packages is acceptable as satisfying the requirements of 10 CFR 71.101(b). A copy of IE Information Notice 84-50: "Clarification of Scope of Quality Assurance Programs for Transport Packages Pursuant to 10 CFR 50, Appendix B" which explains the quality assurance requirements for transport packages was given to the licensee during the inspection.

The failure to maintain records for package maintenance and the failure to audit the quality assurance for packages represents a violation of Criterion XVII and XVIII of Appendix B, Part 50 (84-19-01).

6. Shipments of Radioactive Material

The licensee's program for the transportation of radioactive material was reviewed against the criteria in 10 CFR 71.12, "General license: NRC approved package". The licensee's performance relative to these criteria was determined by interviewing the Radwaste Foreman, and by reviewing appropriate documents.

Within the scope of this review, no violations were identified.

7. Recordkeeping

The inspector reviewed the records of selected radioactive material shipments made by the licensee during 1983, for compliance with the requirements of 10 CFR 71.91. The licensee maintains a record of all radioactive material shipments.

Within the scope of this review, no violations were identified.

8. Package Selection

The licensee's program for selection of packages was reviewed against the requirements of 10 CFR 71.12, "General License: NRC Approved Package", and the DOT requirements of 49 CFR Part 173, "Shippers - General Requirements for Shipments and Packagings."

Copies of the Certificate of Compliance were available for all packages used in 1984.

For dry radioactive waste, the licensee uses steel drums as strong, tight packages. Steel boxes will be used in the future.

Within the scope of this review, no violations were identified.

9. Part 61

The adequacy and effectiveness of the licensee's program for waste classification and waste form were reviewed against the criteria contained in 10 CFR Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste."

The licensee's performance relative to these criteria was determined by interviewing the Rad Waste Supervisor and by reviewing appropriate documents.

Within the review, no violations were identified.

10. Shipment Manifest

The adequacy and effectiveness of the licensee's program for shipment manifest were reviewed against the criteria contained in 10 CFR 20.311, "Transfer for Disposal and Manifests". The licensee's performance relative to these criteria was determined by interviewing the Radwaste Supervisor and Radwaste Foreman, and by reviewing appropriate documents.

Within the scope of this review, no violations were identified.

11. Training

Personnel training in transportation activities were reviewed against the criteria contained in 10 CFR 71.105, "Quality Assurance Program", and IE Bulletin No. 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial."

The licensee's performance relative to these criteria was determined by interviewing the Radwaste Supervisor, the Radwaste Foreman and the Training Superintendent and by reviewing appropriate documents.

Within the scope of this review, no violations were identified.

12. Exit Interview

The inspector met with the licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on August 10, 1984. The inspector summarized the scope of the inspection and the findings.

The licensee was provided a copy of IE Information Notice No. 84-50 during the inspection.