



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

December 16, 1992

U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Byron Nuclear Power Station Unit 1 and 2
Response to Inspection Report 50-454(455)/92018
NRC Docket Number 50-454 and 50-455

Reference: B. Clayton letter to Cordell Reed dated November 16, 1992,
transmitting Inspection Report 50-454(455)/92018.

Enclosed is Commonwealth Edison Company's (CECo) response to the
subject violation which was transmitted with the referenced letter.

The violation concerns the transfer of low level waste to a vendor who was
not authorized to possess the byproduct material.

If there are any questions or comments regarding this response, please
contact Sara Reece-Koenig, Compliance Engineer, at 708/515-7250.

Very truly yours,

P. L. Barnes for

T.J. Kovach
Nuclear Licensing Manager

Attachments

cc: A. Bert Davis, Regional Administrator - Region III
C. Shiraki, Project Manager, NRR
W. J. Kropp, Senior Resident Inspector, Byron

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ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION NRC INSPECTION REPORT 454/92018; 455/92018

VIOLATION

10 CFR Part 30.41(a) and (b) (5) require, in part, that no license transfer byproduct materials except to a person authorized to receive such byproduct material under the terms of a specific or general license issued by the Commission or Agreement State.

Contrary to the above, on August 7, 1992, the license transferred five scrap drums contaminated with byproduct material to a scrap metal vendor who was not authorized to possess the byproduct material under the terms of a specific or general license issued by the Commission or Agreement State.

This is a Level IV Violation (Supplement IV).

RESPONSE

On September 1, 1992 a metal fabricating company discovered they had received contaminated scrap drums, provided by a scrap vendor used by Commonwealth Edison Company. On September 25, 1992, the scrap vendor informed Byron Station of the concern. Byron Station conducted an investigation which determined the barrels originated from Commonwealth Edison.

The investigation at Byron Station determined that the apparent cause was unclear expectations on unconditionally releasing items. The procedures relating to control and release of radioactive material were inconsistent.

Interviews with the personnel indicated that they were knowledgeable of how to properly perform unconditional release surveys. It is postulated that unconditional release surveys were not done to release the barrels from the outer truck bay.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Byron Station surveyed the metal dumpster believed to have contained the barrels prior to shipment and found no radioactive materials. All barrel crushing operations and all barrel shipments from the mixed-waste building were suspended as of September 25, 1992. The mixed-waste building is also under key control of the Station Radiation Protection Department.

The following procedures relating to control and release of radioactive material were clarified as to expectations and processes: BRP 1000-1, "Commonwealth Edison Radiation Protection Standards"; BRP 1000-A2, "Byron Station Radiation Protection Standards"; BRP 1110-1, "Radiation and Contamination Limits"; BRP 1440-4, "Radiological Controls of Materials Released Offsite"; and BAP 720-3, "Material Release from Radiologically Controlled Areas".

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
454/92018; 455/92018

RP-Aid 92-013 was revised to address putting stickers on all items surveyed and segregating material after being surveyed. Several procedures noted above and two additional procedures: BRP 1300-A9, "Respiratory Requirement for Airborne Radioactivity Areas", and BRP 1360-1, "Air Sampling of Suspected and Known Airborne Radioactivity Areas" were revised to match the RP-Aid and to be consistent with all other Station procedures. An RP-Memo (RP-92-0094) was written to address requirements for setting up RCA's outside the Auxiliary Building.

On 11/25/92, revisions to all of the above stated procedures and memo's were approved.

Tailgate, training sessions were held on the procedure revisions with Radiation Protection Department personnel. A formal training follow-up is being conducted utilizing a required reading package.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

Training will be conducted utilizing this event as a discussion format on improving communications. Emphasis will be placed on the importance of using appropriate terminology, i.e.: "unconditional release" .vs. "survey", and on the need to clarify and confirm communications. Training of all personnel, in the affected departments, will be completed by 4/30/93.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on 9/28/92 when Byron Station took possession of the drums and returned them to the Station.