

SUMMARY

Scope:

This announced inspection reviewed Radiation Protection (RP) program activities associated with low-level radioactive waste (LLRW) processing, temporary storage, and transportation; liquid and gaseous effluent monitor operability and surveillances; offsite environmental monitoring; and review of NRC Information Notices (INs), and previously identified issues tracked as NRC Inspector Followup Items (IFIs).

Results:

Routine preventative maintenance activities for equipment and current implementation of required surveillances were considered radiological environmental monitoring program strengths. Licensee identification, evaluation, and subsequent corrective actions for RP program issues identified in deficiency reports and/or audits were considered appropriate. Low volumes, prompt disposal, and minimal onsite storage of LLRW remained a program strength. Additionally, the licensee's program for conducting 10 CFR Part 61 analyses exceeded the current NRC Branch Technical Position (BTP) Guidance and was considered a program strength. Licensee actions regarding routine implementation and emergency preparedness response activities regarding the transportation of radioactive material were considered appropriate. However, RP program weaknesses regarding inattention to detail were noted by the failure to follow procedures for implementing gaseous effluent monitor quality control (QC) activities and for labeling LLRW. The following violation was identified.

Failure to follow procedures for completing gaseous effluent monitor QC activities and for labeling boxes of contaminated sludge stored in the Dry Active Waste (DAW) Storehouse. Two examples of an NRC-identified violation of Technical Specification (TS) 6.10.1 (Paragraphs 4.b and 5.c).

REPORT DETAILS

Persons Contacted

Licensee Employees

*5. Chestnut, Manager, Technical Support *W. Gabbard, Nuclear Specialist, Technical Support *E. Hlavin, Supervisor, Radioactive Waste Operations *K. Holmes, Manager, Health Physics and Chemistry *S. Kitchens, Assistant General Manager *1. Kochery, Superintendent, Health Physics *A Parton, Superintendent, Chemistry *W. Shipman, General Manager *M. Seepe, Supervisor, Radwaste and Decommissioning S. Sundavam, Senior Nuclear Specialist, Chemistry

Other licensee employees contacted included engineers, technicians, operators, and office personnel.

Nuclear Regulatory Commission

*P. Balmain, Resident Inspector *B. Bonser, Senior Resident Inspector *T. Decker, Chief, Radiological Effluents and Chemistry Section, RII *J. Starefos, Intern, Resident Inspector *D. Starkey, Resident Inspector

*Attended December 4, 1992 Exit Meeting

Audits and Deficiency Reports (84750, 86750)

The inspector reviewed April 1 through November 28, 1992 Quality Assurance (QA) audit and Deficiency Report program implementation for RP activities associated with LLRW processing, temporary storage, and transportation; liquid and gaseous effluent monitors; and offsite environmental monitoring. Selected findings and, as applicable, completion of associated corrective actions were reviewed in detail.

a. Audits

2.

TS 6.4.2.8 requires that audits of plant activities be performed under the cognizance of the Safety Review Board (SRB). The audits are required to encompass, in part, conformance of plant operations to provisions within the TSs and applicable license conditions at least once per 12 months; performance, training and qualification of the entire plant staff at least once per 22 months, the Radiological Environmental Monitoring Program and the results thereof at least once per 12 months; the Offsite Dose Calculation Manual and implementing procedures at least once per 24 months; the Process Control Program and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months; and the performance of activities required by the QA Program for effluent and environmental monitoring at least once per 12 months.

The following audits were reviewed and discussed with cognizant licensee representative: during the onsite inspection.

- QA Audit of Plant Chemistry (Offsite Dose Calculation Manual) OPO4-91/38, dated January 30, 1992.
- QA Audit of Radioactive Waste Control OPO5-92/28, dated August 28, 1992.
- Southern Nuclear Operating Company, Commercial Supplier Survey Report of GPC Environmental Laboratory, dated June 2, 1992.
- QA Audit of Plant Chemistry OPO4-92/12, dated June 11. 1992.
- QA Audit of Health Physics and Radiation Protection OP02-92-35, dated November 11, 1992.

The inspector noted that, in general, the audits reviewed adequacy of selected procedures and their subsequent implementation within each specific RP program area, adherence to applicable TSs and 10 CFR Parts 20, 61, and 71, and training and qualifications of affected staff.

For the selected documents reviewed, no violations of TSs or applicable 10 CFR Parts 20, 61, and 71, and/or 49 CFR Parts 171-178, Department of Transportation (DOT) regulations were identified. However, the inspector reviewed and discussed one audit item which received prompt licensee corrective actions concerning improper calculations used in determining low specific activity (LSA) for radioactive waste shipments. Detailed licensee review and followup of the issue determined that initial calculations regarding determination of radioactive concentrations in waste material for evaluation for classification as LSA were inaccurate for eight waste shipments but that the noted errors did not change the LSA classification. Further, the licensee verified that the final radionuclide concentrations required on shipping papers and/or manifests accompanying the waste shipments utilized proper calculations and were documented appropriately. The inspector noted that licensee actions to correct the identified issue were appropriate and included both procedural revisions and additional training for selected personnel. No other environmental monitoring, LLRW processing; transportation or additional concerns similar to issues identified during the current NRC inspection were identified.

No violations or deviations were identified.

b. Deficiency Reports

16

8

License Procedure Number (No.) 00150-C details requirements and responsibilities for identifying, evaluating, reporting, and dispositioning deficiencies, and processing Deficiency Cards (DCs) generated when a deficiency is identified.

The inspector reviewed selected DCs issued from April 1 through November 28, 1992, for identified concerns associated with radioactive waste processing, storage, and/or transportation; and for radiation monitor operability. For the period reviewed, approximately 10 DCs were issued for the selected topics. The inspector verified that the DCs were being processed in accordance with the applicable procedure and that no negative trends regarding waste processing or radiation monitor operability were noted. The following DCs were reviewed and discussed in detail with cognizant licensee representatives.

- 1-92-170 Unit 1 (U1) PEP 12444 monitor found with no particulate filter in front of charcoal, dated September 21, 1992.
- 1-92-180, UI Radiation Monitor IRE 0020B failed 18 month channel calibration voltage plateau check, dated October 8, 1992.
- 1-92-189, U1 Fuel Handling Building isolation due to DPM power failure in ARE 2532, dated October 29, 1992.

For each DC reviewed, licensee actions were noted to be appropriate to meet TS requirements and were conducted in accordance with the applicable procedure.

No violations or deviations were identified.

3. Environmental Monitoring Program (84750)

TS 3/4.12 and TS 3-12.-1 detail the requirements for conducting the radiological environmental monitoring program associated with the Vogtle Electric Generating Plant (VEGP). Required exposure pathways and/or samples for analysis include direct radiation, airborne radioiodine and particulates, surface and drinking water, sediments, fish and broad leaf vegetation.

The inspector requested to review procedural guidance utilized by personnel conducting environmental surveillances of airborne radioiodine and particulate matrices. Environmental Laboratory Procedure No. 850, Vogtle Electric Generating Plant - Radiological Monitoring - Airborne Dust and Gaseous Iodine, Revision (Rev.) 7, dated August 28, 1991, details, in part, the collection, handling, storage, and shipping of airborne dust and gaseous iodine samples. In addition, the procedure provides guidance for routine changeout of air sampling pumps. No concerns were identified for the current procedural guidance.

On December 2, 1992, the inspector accompanied personnel from the Georgia Power Company (GPC) Environmental Laboratory to observe changeout of airborne radioiodine and particulate filters at four of the seven TS-required sampling stations located in the vicinity of the VEGP. The inspector noted that motors/pumps associated with each airborne pathway sampling station were operable and that the associated equipment and/or facilities were maintained properly. Licensee representatives detailed the current preventative maintenance requirements for the pumps associated with each airborne sampling station and confirmed that additional replacement equipment was immediately available to exchange for equipment found inoperable. Further, personnel were knowledgeable of the applicable procedural requirements for both routine filter changeout and for instances when equipment was found to be inoperable or continuous sampling was interrupted.

In addition, the inspector reviewed and discussed surveillance requirements for monitoring both direct radiation by thermoluminescent dosimeters (TLDs) and also, ingestion pathways by collection of surface water, fish, and vegetation samples. The inspector noted that the GPC Environmental Laboratory personnel implementing the VEGP environmental monitoring program were aware of the selected TS-requirements regarding the various exposure pathways reviewed and discussed.

The inspector informed licensee representatives that implementation of required surveillances and associated preventative maintenance regarding the VEGP radiological environmental monitoring program was considered a RP program strength.

No violations or deviations were identified.

4. Radiological Effluent Measurement Systems (84750)

During the onsite inspection, the licensee's programs for calibration of selected gaseous and liquid effluent monitors and for completion of QC activities associated with selected effluent measurements were reviewed and discussed in detail.

a. Liquid and Gaseous Effluent Monitor Calibrations

TSs 4.3.3.9 and 4.3.3.10 detail the surveillance requirements for liquid and gaseous effluent monitoring instrumentation, including calibration frequencies.

The inspector reviewed and discussed with cognizant licensee representatives calibration activities for selected effluent monitoring systems. Effluent monitor calibration records reviewed included monitor calibration and independent verification checkoff sheets, calibration source decay corrections, high voltage plateau

1.1

determination sheets and graphs, and isotopic channel calibration data sheets. From review and discussion of selected data, the inspector noted that licensee representatives were knowledgeable of the procedural requirements for completion of monitor calibrations. Additionally, selected calculations utilized during completion of the monitor calibrations were verified independently by the inspector. Licensee actions and resultant data regarding calibrations were reviewed and discussed in detail with cognizant licensee representatives for the following effluent monitoring systems:

- Unit 1 (U1) Plant Vent Monitor including: Particulate (1RE12442), November 12, 1992; iodine (1RE124428), November 4, 1992; and noble gas (1RE12442C), September 24, 1992.
 - Fuel Handling Building Vent Monitors (ARE-2532A & -2532B), June 27, 1991.
 - Waste Gas Processing System Noble Gas Monitor (ARE-0014), September 3, 1992.
- Ul Waste Liquid Effluent Monitor (IRE0018), October 5, 1992.
 - Ul Steam Generator Blowdown Liquid Process Monitor (1RE-021), July 24, 1992.

For the effluent monitor systems' records reviewed, the inspector verified that the most recent calibration activities were conducted in accordance with procedural and TS requirements. In addition, from review of surveillance task sheets, the inspector verified that the frequencies of selected effluent monitor calibrations were in accordance with TS requirements

No violations or deviations were identified.

b. Effluent Monitor Response Quality Control

0

ά.

TS 6.10.1 requires procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Licensee procedure No. 31000-C, Chemistry Quality Assurance and Control Program, Rev. 10, dated July 5, 1991, requires, in part, quarterly comparison of projected effluent monitor responses for radioactive releases with the actual observed monitor responses to confirm reasonable agreement. Comparisons are required for the waste gas decay releases, and monitors associated with containment purge, plant vent stack, and liquid radwaste effluent streams. The procedure provides acceptance criteria and required actions for results not within specified limits. The inspector reviewed and discussed with licensee representatives the quarterly comparisons conducted for selected effluent monitors during 1992. For the Ul liquid waste monitor (1RE-0018), quarterly effluent monitor comparisons met the acceptance criteria. The inspector noted that similar comparisons were not completed for the Unit 2 (U2) liquid effluent monitor. Licensee representatives informed the inspector that to meet the procedural requirements, completion of the comparison was required for only one monitor from either Ul or U2 liquid effluent systems.

However, the inspector identified concerns for several of the required gaseous effluent monitor comparisons. During 1992, the first quarter containment purge monitor sampling data were not available and, although data were collected, the third quarter containment purge and plant vent sample comparisons were not completed. The inspector verified that the radionuclide concentration data for these effluent pathways were above the licensee analytical detection limits and thus the appropriate comparisons were required to be made. Further, the inspector noted that for the third quarter containment purge mo tor samples, completion of the comparison resulted in a vie outside of the acceptance criteria. The inspector informed licensee representatives that the failure to follow procedures for QC comparisons of the gaseous effluent monitors was an example of an apparent violation of TS 6.10.1 (50-424, 425/92-28-01). Additional review and discussion of the third guarter containment purge monitor performance check results did not indicate any concerns with the affected monitoring systems.

During review of the comparison data, the inspector identified and discussed the following issues associated with the current procedural guidance. The acceptable method to make the proper comparison was not detailed in the procedure. Based on the initial methods utilized for calculating the comparison ratio, monitor results compared to measured radionuclide concentrations or measured concentrations compared to monitor results, the third quarter containment purge comparison results could be within or outside of the acceptance criteria. Further, the procedure did not indicate that for monitor comparisons, the current practice of using only one monitor for each effluent pathway from either Unit to implement the current procedure was appropriate. Licensee representatives stated that licensee personnel conducting the comparisons were aware of the current practices but that the need for increased procedural details would be evaluated.

One example of a violation for failure to follow procedures for completing gaseous effluent monitor quality control activities was identified.

Radioactive Waste Management (86750)

During the inspection the licensee's programs to meet the requirements of 10 CFR Parts 20 and 61, applicable to LLRW temporary storage, classification, characterization, and documentation were reviewed.

a. Waste Manifests

> 10 CFR 20.311(b) requires that a manifest system be used for shipments of waste to a licensed burial facility or licensed waste processor.

> The inspector reviewed selected licensee manifests for three September 1992 LLRW shipments transferred directly to waste processing facilities. All manifests were completed and forwarded to the proper authorities as appropriate.

No violations or deviations were identified.

Waste Classification b.

> 10 CFR 20.311(d) requires, in part, that each licensee prepare all wastes so that the waste is classified according to §61.55 and meets the waste characteristics requirements in §61.56 of this chapter. Further, the NRC BTP Radioactive Waste Classification, dated April 11, 1983, provides acceptable guidance for determining the presence and concentrations of radionuclides for classifying waste for near surface disposal.

During the onsite inspection, current guidance and results for classification of radioactive wastes generated from selected operations were reviewed and discussed with licensee representatives. The following procedures were reviewed and discussed with licensee representatives:

- 10 46100-C, 10 CFR 61 Waste Classification Sampling Program, Rev. 0, dated January 4, 1990.
- 46106-C, Waste Classification Resin Shipments, Rev 3, dated 0 November 13, 1992.
- 0. 46107-C, Waste Classification DAW Shipments, Rev. 3, dated November 13, 1992.

From review and discussion of the current procedural guidance, the inspector verified that the licensee's completion of radionuclide analyses, annually for DAW and with each shipment for other waste streams, exceeded 10 CFR Part 61 requirements and guidance provided in the current NRC BTP. Further, the inspector reviewed and discussed with licensee representatives, the October 1991 through October 1992 quarterly reevaluation of gamma emitter results for smear samples utilized for DAW waste classification.

5.

All evaluations were conducted in accordance with the approved procedure.

The inspector reviewed and discussed with cognizant licensee representatives, selected manifest and shipping paper documentation associated with DAW materials transported to a vendor for processing. In particular, the inspector reviewed licensee classification of DAW associated with shipment RVRS-92-07, consisting of 55-gallon drums of compacted High Radiation DAW consisting of trash, paper, plastic, cloth, wood and metal. The inspector noted that dose rates for one of the drums was listed as 220 millirem per hour (mrem/hr) at one meter which exceeded the maximum dose rate of 100 mrem/hr requiring additional review for verification as Class A waste. From review and discussion of the results, the inspector verified that additional review was conducted by the appropriate supervisor and that based on the extrapolated isotopic composition and quantities the waste was classified appropriately as Type A in accordance with §61.55 criteria.

The inspector noted that the licensee procedural guidance was implemented appropriately and exceeded the applicable NRC BTP guidance and 10 CFR Parts 20 and 61 requirements.

No violations or deviations were identified.

c. Solid LLRW Generated, Processed, and Stored

The inspector toured selected onsite radioactive waste processing and storage areas, and reviewed and discussed with licensee representatives the LLRW quantities generated, stored and shipped for burial or processing.

During 1992, which included the UI Cycle 3 outage, approximately 3300 cubic feet (ft³) of solid radioactive waste was generated and processed for disposal. This value compares to 2364 ft³ generated during 1991 which also included the U2 Cycle 2 outage. Licensee representatives stated that during 1992 approximately 2145 ft³ of radioactive waste was generated and processed for disposal from routine and outage activities but that the additional 1155 ft³ of waste consisted of contaminated sludge containing nearly 45 microcuries (μ Ci) of activity which was generated prior to 1992. Further, licensee representatives stated that in addition, nearly 1200 ft³ of sludge containing 40 μ Ci of activity was stored onsite awaiting processing and final disposal. The inspector noted that the low volume of radioactive waste generated and timely disposal of material were considered program strengths. TS 6.10.1 requires procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Licensee procedure No. 46017-C, Controï, Monitoring and Removal of Materials in Radiation Controlled Areas, Rev. 13, dated May 6, 1992, requires all contaminated or potentially contaminated materials stored within radioactive material storage areas to be labeled with the appropriate information on a radioactive material tag or sticker, or for materials with concentrations less than 10 CFR 20.203 limits, to be labeled as "No Label Required."

The inspector toured onsite LLRW storage areas. During tours of the DAW Storehouse on December 2, 1992, the inspector noted three B-25 boxes without any visible labels. However, one of the boxes had the word "hot" painted on one of its sides. A licensee representative accompanying the inspector was not aware of the actual contents of the unlabeled B-25 boxes but stated that they most likely contained soils contaminated with low levels of radionuclides. The inspector noted that in addition to contaminated soils, other boxes and containers maintained within the DAW Storehouse held contaminated equipment or materials. Subsequently, the licensee opened the box and collected samples of the materials (sludge) for radionuclide analyses. Gamma spectroscopy analysis results indicated low levels of radionuclides including cobalt-58 (Co-58) 1.158 E-7 µCi, cesium-134 (Cs-134) 4.609 E-7 µCi; and Cesium-137 (Cs-137), 3.588 E-07 μ Ci for the materials. The measured radionuclide quantities were less than values requiring labels in accordance with 10 CFR Part 20.203 requirements, the material did meet the procedural requirements for the B-25 boxes to have a "No Label Required" designation affixed. The inspector informed licensee representatives that the failure to follow procedures for labeling B-25 boxes containing contaminated sludge was an additional example of a violation of TS 6.10.1 (50-424, -425/92-28-01). The inspector noted that although no significant exposure to personnel was expected, the failure to label the boxes in accordance with licensee procedures could result in the improper disposal of the noted material.

An additional example of a violation for failure to follow procedures involving inadequate labeling containers of contaminated materials maintained in the DAW Storehouse was identified.

6. Transportation Activities (86750)

During the onsite inspection, transportation activities including procedural guidance, training implementation, record completeness and accuracy, and emergency response activities to meet 10 CFR Part 71, and 49 CFR Parts 171-178, requirements were reviewed.

10 CFR 71.5(a) requires that each licensee who transports licensed material outside the confines of its plant or other place of use, or who delivers licensed material to a carrier for transport, to comply with the applicable requirements of the regulations appropriate to the mode of transport of the DOT in 49 CFR Parts 170-189.

a. Procedural Guidance

During the inspection, procedure 46110-C, Shipment of Radioactive Waste, Rev. 3, dated November 9, 1992, was reviewed specifically for guidance in implementation of requirements for shipping document preparation, transportation of LSA shipments, and radiological contamination control. The inspector verified that selected details of the current guidance reviewed met the applicable requirements specified in 49 CFR Parts 171 through 178.

No violations or deviations were identified.

b. Records and Manifests

Selected records of transportation activities involving contaminated laundry to a vendor for processing or waste shipments made to a licensed waste processing/burial facility were reviewed and discussed with cognizant licensee representatives.

- Shipment No. 92-CL-033, Contaminated Laundry.
- Shipment No. RVRS-92-027, 55-Gallon drums of compacted high rad dry active waste (DAW), consisting of trash, paper, plastic, cloth, wood and metal.
- Shipment No. RVRS-92-023, Non-compacted DAW, trash, paper, plastic, wood, and metal.
- Shipment No. RVRS-92-25, Steam generator blowdown resins.

For each shipment, the following documents and checklists associated with the shipments, as applicable, were reviewed for adequacy and completeness.

- Bill of Lading
- Radwaste Shipment Manifest Form
- Individual Drum Surveys
- Vehicle Radiation Surveys
- Emergency Notification Sheets
- Exclusive Use/Driver's Instructions
- Instructions to Carrier for Hazardous Substance Reportable Quantity

The inspector noted from selected record reviews and discussion with cognizant licensee representatives that documentation was completed as appropriate and the shipments met the applicable conditions specified in 49 CFR Parts 171-178.

No violations or deviations were identified.

. Emergency Response Activity

49 CFR 172.600 requires, in part, that a person offering a hazardous material for transportation must provide a 24-hour emergency response telephone number for use in the event of an emergency involving the hazardous material. The telephone number must be the number of a person knowledgeable of the hazardous material being shipped and who has comprehensive emergency response and incident mitigation information for that material, or who has immediate access to a person possessing such knowledge and information.

Licensee's emergency response actions as required by 49 CFR 172.604 for use in the event of an emergency involving the transport of radioactive materials were evaluated by conducting test calls for a consignment of contaminated clothing transported to a licensed commercial laundry. On December 1, 1992, between 20:30 and 21:00 hours, the inspector telephoned the licensee's 24hour emergency response numbers listed on a copy of the Emergency Notification Shipment Papers which were provided to the vehicle driver. Both numbers representing the Shift Superintendent and the Health Physics (HP) foreman, were answered promptly and the individuals contacted were aware of the shipment status, the location of all shipping documentation, and subsequent emergency notifications to be made. However, at the time of the test-call, the inspector was informed by the individuals contacted that the shipment had reached its destination earlier in the day and no further action was appropriate. Licensee actions regarding this issue were considered a program strength.

No violations or deviations were identified.

7. Followup Items (92701)

The following NRC IFIs and NRC INs were reviewed and discussed with cognizant licensee representatives.

a. IFI Review

(Closed) IFI 50-424, 425/91-06-01: Verify licensee actions to resume containment atmosphere sampling.

This issue concerned review of licensee actions to resume sampling of containment atmosphere following determination that opening of the Containment Isolation Valves (CIVs) for extended periods of time during monthly Post Accident Sampling System (PASS) surveillances and for twice-a-month Containment Hydrogen Monitor surveillances had resulted in a violation of TSs 3.6.3 and 3.0.3. Licensee long-term corrective actions regarding the identified violation included the submission of a request to change the license which would allow the CIVs to be opened periodically under administrative control without entering a Limiting Condition for Operation (LCO).

A request to revise TS 3.6.3 was submitted to the NRC in a letter dated May 3, 1991. The change to the specified TS was approved in Amendment Nos. 53 and 32, as noted in a letter to Mr. W. G. Hairston, II, Senior Vice President Nuclear Operations Georgia Power Company from Mr. D. S. Hood, Project Manager, Office of Nuclear Reactor Regulation, NRC, dated August 20, 1992. The TS now allows that the isolation valves associated with the containment hydrogen monitors may be opened on an intermittent basis under administrative control.

In accordance with the revised TS requirements, the inspector verified that licensee procedures 35611-C, Remote Operation of the Post Accident Sampling System, Rev. 16, and 35614-C, Operation of the Post Accident Sampling System, Rev. 10, both dated October 1, 1992, specified the appropriate caution statements. However, during discussions with licensee representatives regarding the Containment Hydrogen Monitor system surveillances, licensee representatives stated that the routine Containment Hydrogen Monitor surveillances use an electronic check and that use of an actual containment atmosphere sample was discontinued. Following discussions with the inspector and review of applicable procedures, licensee representatives stated that the procedures 24551-1 and 24551-2 which reference the associated surveillances, would be revised to include the appropriate caution statements in the event that containment hydrogen samples are collected.

As a result of previous concerns regarding sampling of hydrogen from containment, the inspector reviewed VEGP data verification sheets for dissolved hydrogen concentration data obtained from laboratory analysis versus PASS analyses. All values were within ±5 cubic centimeters per kilogram (cc/kg) for samples collected between June 16, through June 23, 1992. No additional concerns regarding the PASS and/or containment hydrogen sampling were identified.

The inspector informed licensee representatives that this issue would be considered closed based on review of completed actions and proposed revisions to the appropriate operational procedures. The inspector verified that the following INs were received by the licensee, reviewed for applicability, distributed to appropriate personnel and that action, as appropriate, was taken or planned.

- IN 92-62: Emergency Response Information Requirements for Radioactive Material Shipments
 - IN 92-72: Employee Training and Shipper Registration Requirements for Transporting Radioactive Materials

8. Exit Interview (84750, 86750)

The inspection scope and results were summarized on December 4, 1992, with those persons indicated in Paragraph 1 above. The general program areas reviewed and identified strengths and weaknesses for each were discussed in detail. The inspector reviewed the specific examples regarding a apparent violation for failure to follow procedures for gaseous effluent monitor QC activities and for labeling B-25 boxes maintained in a Radioactive Waste Warehouse. Licensee representatives acknewledged the inspector's comments and requested that the violation for failure to follow procedures for labeling B-25 boxes containing lowlevel contaminated soil be considered as an example of a non-cited violation based on the low concentration of radionuclides contained in the containers. The inspector acknowledged the licensee's request and stated that this issue would be reviewed by NRC management prior to final issuance of the report. No additional comments were received from the licensee. Additionally, licensee representatives stated that proprietary information was not reviewed during this inspection.

Item Number

Description and Reference

50-424, 425/92-28-01

VIO - Failure to follow procedures for completing gaseous effluent monitor quality control activities and for labeling boxes of contaminated sludge stored in the DAW Storehouse. Two examples of an NRC-identified violation of TS 6.10.1 (Paragraphs 4.b and 5.c).

INS

b.