GPU Nuclear

GPU Nuclear Corporation
Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number:

October 17, 1985

Thomas T. Martin, Director
Division of Radiation Safety and Safeguards
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report No. 85-25

As requested by the subject inspection report dated September 11, 1985, Attachment I to this letter provides our response to the Notice of Violation.

Should you require further information, please contact Brenda Hohman, Oyster Creek Licensing Engineer at (609)971-4642.

Very truly yours,

Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF/BH/dam
Enclosures
(0103A)

cc: Dr. Thomas E. Murley, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Mr. Jack N. Donohew, Jr.
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20014

Resident Inspector
Oyster Creek Nuclear Generating Station

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ATTACHMENT I

VIOLATION

10 CFR 20.311(d)(3), "Transfer for disposal and manifests" requires a licensee who transfers radioactive waste to a land disposal facility to conduct a quality control program to assure compliance with 10 CFR 61.55 and 10 CFR 61.56.

Contrary to the above, the licensee has transferred several radioactive waste shipments to a land disposal facility during 1984 and 1985 and the licensee has not conducted a quality control program to assure compliance with 10 CFR 61.55 and 10 CFR 61.56 inasmuch as the licensee has not verified that spent resin contained less than 1% liquid by volume when the resin was in a disposal container (high integrity container) designed to ensure stability, and neither did the licensee verify that the solidification process was as effective as described in the Topical Report. In addition, the licensee did not verify that the computer program used in waste classification performed the required functions.

This is a Severity Level IV violation.

DISCUSSION

GPUN has maintained and continues to maintain an extensive QA Monitoring Program to verify that various programs are implemented and meet established requirements. Radioactive Material Shipping and Handling is one of approximately 30 programs under the scope of QA Monitoring.

Through periodic planning and scheduling activities, Operations QA determines how their current resources can be most effectively utilized. These determinations consider the need for achieving broad scope coverage in each program that is monitored as well as the need to address significant areas of concern.

During 1984, approximately 80 monitorings were performed on radioactive material shipping. In 1985, to date, over 170 monitorings have been performed in that area. This number is greater than that for any other program monitored during the same time period. A sufficient portion of the total radioactive material shipping and handling program was monitored to provide confidence that the program in general is properly implemented and meets established requirements.

It was determined in late 1984 and for more than half of 1985 that, in the area of radioactive material shipping, our monitoring resources would be best spent addressing the highly sensitive project of returning spent fuel from West Valley, NY to Oyster Creek. Now that this project is complete we have resumed progress toward broader scope coverage in radioactive materials handling and shipping, specifically: waste solidification, resin dewatering, and waste classification as outlined below in our response to the violation.

Further, it should be noted that Operations QA reviewed all procedures' related to dewatering, solidifcation and shipping prior to implementation to assure that proper controls would be in place to satisfy requirements of 10CFR61.55 and 10CFR61.56.

RESPONSE

Corrective Steps Which Have Been Taken and the Results Achieved:

Changes to the Operations QA (Ops/QA) Monitoring Program are currently underway in order to fully comply with 10 CFR 20.311(d)(3) and to assure full compliance with 10 CFR 61.55 and 61.56. In order to properly conduct this program, Ops/QA will have prior notification for:

1. All PCPs to be performed
2. All solidifications
3. All resin dewaterings
4. All oil absorptions

The necessary procedures are being revised to incorporate these notification requirements. Temporary changes to these procedures were in effect as of September 23, 1985.

Corrective Steps to Avoid Further Violations:

Resin Dewatering: The resin dewatering process will be periodically monitored during the process and/or at final verification of less than 1% free standing water. All documentation/calculations used in verifying that the acceptance criteria have been met will be reviewed.

Computer Program: Ops/QA will periodically review RADMAN (the computer program used to determine waste classification) to ensure:

1. Records are maintained of changes to waste sample data, deletion of sample data, or addition of data for a new waste type.

2. Records are maintained of changes to the characteristic files maintained for the various waste types.

   Included in this review will be the current RADMAN data book. Ops/QA will verify that hardcopy sample data were input correctly into the waste characteristic file for wastes being shipped.

Solidification Verification: The following activities will be periodically monitored to verify that the solidification process is as effective as described in the Topical Report.

1. Sample solidification of various waste forms to be solidified. CNSI document SD-OP-003, "Process Control Program for CNSI Cement Solidification Units", requires a sample solidification prior to full scale solidification. Ops/QA will monitor CNSI operator's performance of this test at least once every third shipment for each type of waste form.

2. Completion of CNSI Solidification Worksheets and full scale calculations. These documents are used to determine the volume of waste material to be received and the amounts of solidifying agents that will be added.

3. Addition of waste and solidfying agents to ensure the amounts added are those determined in the full scale calculations.

4. Visual inspection of the end product to ensure a uniform product with no free standing water.

5. After solidification has been completed and prior to capping the liner, visual inspection of the end product will be conducted to ensure it resists penetration when probed with a rod, approximately 1 inch in diameter.

Full compliance was achieved as of September 23, 1985 when temporary changes to procedures went into effect. The monitoring program is now in effect.