

PHILADELPHIA ELECTRIC COMPANY

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JOSEPH W. GALLAGHER
VICE PRESIDENT
NUCLEAR SERVICES

May 4, 1988

Docket Nos. 50-277
50-278

Mr. Ronald R. Bellamy, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety
Region I
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: Response to Peach Bottom Inspection Report
Nos. 50-277/88-05; 50-278/88-05

Dear Mr. Bellamy:

This is in response to your letter dated April 4, 1988 which transmitted Peach Bottom Inspection Report Nos. 50-277/88-05; 50-278/88-05. Appendix A of your letter identified two items which did not appear to be in compliance with NRC requirements. The attachment to this letter provides a restatement of these violations and Philadelphia Electric Company's response.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

JW Gallagher

Attachment

cc: Addressee

W. T. Russell, Administrator, Region I, USNRC
T. P. Johnson, USNRC Senior Resident Inspector
T. E. Magette - State of Maryland

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RESTATEMENT OF VIOLATIONS:

As a result of the inspection conducted on February 8-12, 1988 and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy 1987), the following violations were identified:

- A. 10 CFR 30.41(c) requires in part, that each licensee transferring byproduct material verify that the recipient's license authorized the receipt of the type, form and quantity of the byproduct material to be transferred.

Contrary to the above, on or about November 25, 1987, your shipment No. 82-87, containing tritium in 52 drums of solidified oil was transferred to Quadrex-HPS, Inc. (An Agreement State licensee) and the Agreement State license at the time of transfer did not authorize receipt of tritium in that form.

- B. Technical Specification 6.8 requires, in part, that written procedures be implemented. Your procedure No. HPO/CO-17 required, in part, verification of the recipient's license prior to transfer of radioactive material.

Contrary to the above, on or about November 25, 1987, you failed to verify, prior to transfer, that the recipient's license allowed receipt of the radioactive material (tritium) in the form (solidified oil) transferred.

Violations A and B have been categorized in the aggregate as a Severity Level IV problem.

RESPONSE:

Admission or Denial of Alleged Violations:

Philadelphia Electric Company (PECo) acknowledges these violations as stated.

Reason for Violations:

This violation occurred because a Radioactive Materials Shipping Coordinator failed to fully comply with Procedure No. HPO/CO-17B, "Packaging and Shipment of Radioactive Material", which requires verification "that the consignee is licensed to receive the material that is to be shipped." The individual checked the consignee's license for expiration date but did not verify that the license permitted receipt of the radioactive material to be shipped. Previous frequent shipments of other radioactive material to the same facility caused a complacency with the details of the facility's license. The shipment in which the violation occurred was the first shipment of a different form (solidified) of material than was previously shipped. This event is considered to be an isolated case. This individual's performance prior to this incident was above average.

Extent or Significance of Violations:

This event did not result in an increased risk to the health and safety of the public, even though the shipment was held in a transportation impound yard for several days while a change to the consignee's license was processed. The shipment was not received by the consignee until a temporary license amendment was issued by the state of Tennessee authorizing the receipt. The waste form of the shipment containing tritium was Environstone, a cement-based solidification process. This waste form is a stable end product acceptable to the burial site (final destination). The waste form was contained in steel drums. The solidified product and steel container effectively preclude any migration of the tritium to the environment for at least several half-lives. In this form there is essentially no pathway for human ingestion. The shipment of tritium was in compliance with Department of Transportation regulations and is typical of shipments from nuclear plants.

Corrective Actions Taken to Prevent Future Non-Compliance and Results Achieved:

A review of a representative sample of previous radioactive materials shipment records, and interviews with all shipping coordinators, confirmed that this was an isolated case. The Shipping Coordinator who was responsible for the error and the Shipping Coordinator who approved the entire shipment were

counseled on the importance and absolute necessity for strict adherence to procedures.

On February 9, 1988 (during the inspection), a meeting was held between the Senior Engineer-Radwaste and the radwaste shipping group, explaining the violation and the cause of the violation. Another meeting on the same day was held between the shipping supervisor and those individuals involved with the shipment.

Date When Full Compliance Was Achieved:

On December 8, 1987, Tennessee issued a temporary license amendment permitting receipt of this shipment by the consignee, thereby solving the problem created by these violations.