



Duquesne Light

Nuclear Group
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May 9, 1988

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

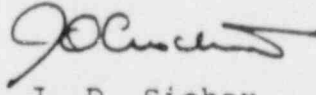
Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Inspection Report 88-09

Gentlemen:

In response to NRC correspondence dated April 8, 1988 and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included with the referenced report.

If there are any questions concerning this response, please contact my office.

Very truly yours,

for 
J. D. Sieber
Vice President
Nuclear Group

Attachment

cc: Mr. J. Beall, Sr. Resident Inspector
Mr. Ronald R. Bellamy, Chief Region I Facilities
Radiological Safety and Safeguards Branch
Mr. W. T. Russell, NRC Region I Administrator
Director, Safety Evaluation & Control (VEPCO)

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DUQUESNE LIGHT COMPANY
Nuclear Group
Beaver Valley Power Station, Unit No. 1

Reply to Notice of Violation
Inspection 88-09
Letter dated April 8, 1988

VIOLATION (Severity Level IV; Supplement V)

Description of Violations (88-09-02 and 88-09-03)

- A. 10 CFR 20.311(b) requires, in part, that the manifest accompanying radioactive waste shipments indicate as completely as practicable the radionuclide identity and quantity and the total radioactivity in the shipment. 10 CFR 20.311(c) requires, in part, that the manifest must include a certification by the waste generator that the transported materials are properly described.

Contrary to the above, on September 8, 1987, your Shipment Number 0951 of radioactive waste was sent to a supercompacting facility and was accompanied by a manifest which did not identify the existence and quantities of radioactive wastes contained in four of the eighty-four drums in the shipment. As a result, the total radioactivity stated on the manifest was in error. Further, the certification which accompanied the manifest was also in error.

- B. 10 CFR 71.5(a)(1)(vi) requires that shipping papers be prepared in accordance with 49 CFR 172, Subpart C. 49 CFR 172.203(d)(iii) requires the activity of each package in the shipment be included in the shipping papers.

Contrary to the above, on September 8, 1987, your Shipment Number 0951 of radioactive waste was sent to a supercompacting facility and the shipping papers did not include the activities of the radionuclides contained in four of the eighty-four drums in the shipment.

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

Corrective Action Taken

Upon notification from the supercompacting facility that the shipment included four (4) more drums of waste than were identified on the shipping papers, Duquesne Light immediately notified the Resident NRC Inspector. An evaluation was conducted to determine the radiological consequence of the event. The radiological consequences were determined to be minimal as the four drums contained low level contaminated polyethylene. The drum with the highest contact radiation level had a reading of 0.08 mr/hr. The four drums contained a total activity of 179 microcuries. Additionally, the vehicle was surveyed as required by regulations prior to leaving the site. All radiation levels were below regulatory limits.

Reply to Notice of Violation
Inspection 88-09
Letter dated April 8, 1988
Page 2

Action Taken to Prevent Recurrence

Radcon Procedure 3.29, Inspection of Radioactive Material Packaging Prior to Shipment, has been revised to strengthen the surveillance requirements during trailer loading operations and to clarify that the signoff requirement is to document acceptable material condition and total package count.

Radcon Procedure 3.6, Radioactive Shipment Record, has been revised to require all hand-generated data be retained as a permanent record with the radioactive shipping record package.

Date of Full Compliance

Full compliance has been achieved at this time. The revisions to the above referenced procedures were approved and implemented in November 1987.