

BOSTON EDISON COMPANY  
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

March 11, 1986  
BECO Ltr. #86-030

Dr. Thomas E. Murley  
Regional Administrator - Region 1  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Subject: Response to Notice of Violation as Contained in NRC Letter to  
Boston Edison dated 2/12/86 (Inspection Report No. 86-04)

- References: (A) Letter dated 1/07/86 from South Carolina Department of Health and  
Environmental Control, Containing Civil Penalty and (2) Items of  
Non-Compliance
- (B) Letter dated 1/28/86 from Boston Edison Company to South Carolina  
Department of Health and Environmental Control, Responding to  
Items of Non-Compliance and Civil Penalty

Dear Dr. Murley:

This letter is in response to the Notice of Violation as contained in Reference  
(A). As mentioned in our response to the South Carolina Department of Health and  
Environmental Control [Reference (B)], we would like to assure you that Boston  
Edison Company has taken adequate corrective measures to ensure future compliance  
with the applicable provisions of federal and state laws as they apply to low-level  
radioactive waste shipments.

I trust that the attached response will adequately exhibit our serious commitment  
to continuing compliance in this area.

Please be advised that, upon review of this matter, Boston Edison has decided that  
further programmatic review and improvements are both necessary and desirable. The  
improvements are intended to impose enhanced quality requirements on radioactive  
waste processing, handling and shipping operations. Our approach will consist of a  
detailed review of 10 CFR 71 Subpart H and a more thorough integration of  
appropriate requirements into our existing Quality Assurance Program per 10 CFR 50  
Appendix B. We expect to have a more detailed plan and schedule in approximately  
thirty days at which time a copy will be forwarded to the Senior Resident Inspector  
at Pilgrim Station.

Should you have further questions concerning these matters, please do not hesitate  
to contact me.

Respectfully submitted,

*W D Harrington*

William D. Harrington

Attachment

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PDR ADOCK 05000293  
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HE-01

## ATTACHMENT

### Violation

As the result of the inspection conducted on January 2, 1986, by a representative of the South Carolina Department of Health and Environmental Control of a shipment of radioactive waste sent from your facility in Plymouth, Massachusetts on December 30, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

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

1. 49 CFR 173.425(b) (1) "Transport requirements for low specific activity (LSA) radioactive materials" states that materials must be packaged in strong, tight packages so that there will be no leakage of radioactive material under conditions normally incident to transportation."

Contrary to the above, on December 30, 1985, a waste shipment of solid metallic oxides on noncompacted trash, containing 0.195 Curies in a Seatrain container was delivered to a carrier for transport to a burial site in South Carolina, and upon inspection of the container at the burial site on January 2, 1986, by a representative of the State of South Carolina Department of Health and Environment Control, it was determined that there were "three (3) small holes on the left rear side which allowed some of the contents to be visible."

2. 49 CFR 173.475(b) "Quality Control requirements prior to each shipment of radioactive materials" state, "the shipper shall ensure by examination or appropriate tests that the packaging is in unimpaired physical damage condition, except for superficial marks."

Contrary to the above, on December 30, 1985, a waste shipment of solid metallic oxides on noncompacted trash, containing 0.195 Curies in a Seatrain container was delivered to a carrier for transport to a burial site in South Carolina, without ensuring prior to shipment that the packaging was in unimpaired physical condition. The container was inspected at the burial site on January 2, 1986, and at that time a representative of the State of South Carolina Department of Health and Environmental Control determined that the Seatrain container was corroded and damaged.

## Response

Boston Edison agrees with both items. Although the subject container was duly inspected and signed off prior to shipment by experienced personnel in accordance with existing Pilgrim Station Procedure 6.9.194 ("Loading Transport Vehicle for Radioactive Material and Waste Shipment"), it nevertheless appeared the metal of the cargo container was delaminating due to corrosion, and during transit, the lamination broke loose, leaving the small holes exposed.

Corrective action taken to correct the condition and to preclude recurrence is that Procedure 6.9.194 ("Loading Transport Vehicle for Radioactive Material and Waste Shipments") has been revised and strengthened to include a checklist requiring receipt inspections be performed on Seatrains cargo containers. The procedure has also been improved to include further checklists assuring that the subject shipping container will be inspected for evidence of corrosion and/or damage prior to shipment. Any indication of corrosion and/or damage will be rectified prior to shipment.

As further corrective action to preclude recurrence, the Training Department will re-emphasize (to individuals involved in the shipping process) the importance of compliance with pertinent regulations and requirements. The subject violation will be used as a specific example in training, as will the procedural improvements which have been made. Full compliance was achieved on January 23, 1986, the date upon which Procedure 6.9.194 was revised to include the aforementioned improvements.