



Duquesne Light

Nuclear Group
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May 20, 1986

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: Thomas T. Martin, Director
Division of Radiation Safety and Safeguards
Region 1
631 Park Avenue
King of Prussia, PA 19406

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Inspection Report 86-05

Gentlemen:

In response to your letter of April 21, 1986, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included with the referenced inspection report.

Your letter requested that we describe the actions taken and planned to improve management control of the transportation program to prevent such violations in the future. Our own assessment of our transportation program confirms your inspector's opinion that consolidation of responsibilities related to all aspects of the transportation program, except Quality Assurance and Quality Control functions, be assigned to a single individual and department fully cognizant of all the requirements of the program. Therefore program, procedure and organizational changes will be made by August 31, 1986 which will assign total responsibility for the transportation program to the Radiological Controls Department. The individual assigned responsibility for the transportation program will be cognizant of its requirements.

Further, we have already reviewed the applicable waste packaging, handling and transportation procedures to upgrade them to acceptable quality. Our further review and improvement of these procedures will be ongoing.

Our review of the four (4) violations cited leads us to the conclusion that the circumstances cited in Violations B and D do not represent a violation of NRC regulations. The bases for our opinion is included in the attached Reply to Notice of Violation.

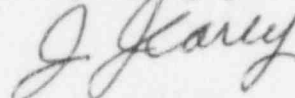
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If you have any questions concerning this response, please contact my office.

Very truly yours,



J. J. Carey
Vice President, Nuclear

Attachment

cc: Mr. W. M. Troskoski, Resident Inspector
U. S. Nuclear Regulatory Commission
Beaver Valley Power Station
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission
c/o Document Management Branch
Washington, DC 20555

Director, Safety Evaluation & Control
Virginia Electric & Power Company
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Richmond, VA 23261

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

Reply to Notice of Violation
Inspection 86-05
Letter dated April 21, 1986

VIOLATION A (Severity Level IV; Supplement V)

Description of Violation (86-05-01)

10 CFR 71.5 prohibits delivery of licensed material to a carrier for transport unless the licensee complies with applicable regulations of the Department of Transportation in 49 CFR Parts 170-189. 49 CFR 173.425 (b)(1), "Transport requirements for low specific activity (LSA) radioactive materials", requires that packaged shipments of LSA material consigned as exclusive use 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 October 17, 1985, two 55-gallon steel drums (Drums No. 14 and 24) containing low specific activity material were consigned to a carrier for exclusive use to transport to Quadrex Corporation in Oak Ridge, Tennessee, and the drums were not strong and tight. Specifically, Drum No. 14, containing 0.021 millicuries of radioactive material, had four holes, approximately 1/4 inch in diameter, that penetrated to the inside of the barrel and were located about one inch below the barrel lid locking ring. Drum No. 24 was punctured on the bottom, and the punctures consisted of two "slashes" about three inches long by 1/4 inch wide, which had been covered with yellow tape.

Corrective Action Taken

To ensure the packages in all types of radioactive material shipments are appropriately inspected, Radcon Procedure 3.29, Inspection of Radioactive Material Packaging Prior to Shipment, was developed and implemented.

This procedure provides a format (Inspection Record) for documenting package inspections when checklists, required for specific types of packages (e.g. casks) are not applicable.

The existing inspector requirements have been upgraded as a result of implementing the above referenced procedure.

Action Taken to Prevent Recurrence

The above referenced procedure will be utilized, and revised as necessary, to avoid further violations.

Date of Full Compliance

We are in full compliance at this time. Radcon Procedure 3.29, Inspection of Radioactive material Packaging Prior to Shipment, was implemented in February 1986.

VIOLATION B (Severity Level IV; Supplement V)

Description of Violation (86-05-02)

10 CFR 71.101(b) requires each licensee to establish a quality assurance program for packages. 10 CFR 71.101(f) states that a Commission approved quality assurance program that satisfies the applicable criteria of Appendix B, Part 50, of this chapter, and which is established, maintained, and executed with regard to transport packages will be accepted as satisfying the requirements of paragraph (b) of this section.

Criterion XVIII of Appendix B, Part 50, requires, in part, that a comprehensive system of planned and periodic audits be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program. The audits shall be performed by appropriately trained personnel.

Criterion II of Appendix B, Part 50, requires, in part, that the program provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.

Contrary to the above, during the period of June-July 1985, Quality Assurance Maintenance personnel conducted an audit of the Solid Waste Management area, and the three Auditors performing the audit had not been adequately trained to assure that suitable proficiency was achieved and maintained. Specifically, although the Lead Auditor receive two to three days training in transportation activities in May 1984, and the other Auditors received two days training during the period of October-November 1985, this training was not adequate in that the training material provided was too voluminous and complex to be absorbed and retained in a two-day training program.

Admission or Denial of Violation

Duquesne Light Company denies Violation 86-05-02.

Discussion

We have reviewed the training provided to the auditors for the subject QA audit of the Beaver Valley Unit 1 Radwaste Handling Program. The purpose of the cited audit was to assess compliance with the requirements of the Radwaste Handling Program as specified in the appropriate procedures and regulatory documents.

We are committed to ANSI/ASME N45.2.23-1978. Paragraph 2.2 states that the responsible auditing organization shall establish the audit personnel qualifications and the requirements for use of technical specialists to accomplish the auditing of the Quality Assurance programs.

VIOLATION B, (Continued)

Additionally, this paragraph states that personnel selected for Quality Assurance auditing assignments shall have experience or training commensurate with the scope, complexity, or special nature of the activities to be audited.

Considering the scope of this audit, the auditor training provided to date satisfies the requirements of the Quality Assurance Program as applied to Radwaste Handling and Transport and ANSI N45.2.23-1978. The experience level of the three (3) auditors was at least three (3) years each in Quality Assurance and a combined total of eighteen (18) years of nuclear plant experience.

The Quality Assurance Unit has a training program which qualifies and certifies personnel who conduct audits. In the area of Radwaste Handling and Transport, additional training was provided.

Although the Notice of Violation refers to this training as too voluminous and complex to be covered in a two (2) day period, the auditing personnel who received it demonstrated their comprehension and satisfied the objectives of the course as evidenced by successful completion of the examination conducted at the completion of the course. Additionally, the student handout, which consisted of a list of objectives, a review summary of the Department of Transportation regulations for transport of radioactive materials, quantity tables, I.E. Information Notice 80-32, 10CFR61, examples of BVPS paperwork, and the Burial Site Criteria was provided for future reference purposes.

After reviewing the governing requirements, the intent, scope and complexity of the audit, and the auditors' experience, background and routine and specialized training, it is concluded that the auditing personnel had more than adequate and appropriate experience and training to assure that suitable proficiency was achieved and maintained. For these reasons, we respectfully request that this violation be withdrawn.

VIOLATION C (Severity Level V; Supplement V)

Description of Violation (86-05-03)

Technical Specification 6.8, Procedures, requires that procedures be established, implemented, and maintained. Item E.12 of Station Administration Procedure, Chapter 6, Radiological Control Group Administration, developed pursuant to the above, requires that procedures be reviewed at a minimum interval of every two years, or after significant changes or incidents, to determine if changes to the procedures are necessary or desirable.

Contrary to the above, as of March 14, 1986, Procedure No. FO-OP-004, "Dewatering Procedure for the 24-Inch Diameter Pressure Demineralizer Vessel Containing Ion Exchange Resins" used on at least one occasion during 1985, had not been reviewed since June 15, 1983, an interval of more than two years.

Corrective Actions Taken

A review of procedure FO-OP-004 was performed and documented.

Actions Taken to Prevent Recurrence

A log to track the reviews of Radwaste procedures has been generated to ensure the two-year review requirement is met.

Date of Full Compliance

Full compliance has been achieved at this time.

VIOLATION C (Severity Level V; Supplement V)

Description of Violation (86-05-03)

Technical Specification 6.8, Procedures, requires that procedures be established, implemented, and maintained. Item E.12 of Station Administration Procedure, Chapter 6, Radiological Control Group Administration, developed pursuant to the above, requires that procedures be reviewed at a minimum interval of every two years, or after significant changes or incidents, to determine if changes to the procedures are necessary or desirable.

Contrary to the above, as of March 14, 1986, Procedure No. FO-OP-004, "Dewatering Procedure for the 24-Inch Diameter Pressure Demineralizer Vessel Containing Ion Exchange Resins" used on at least once occasion during 1985, had not been reviewed since June 15, 1983, an interval of more than two years.

Corrective Actions Taken

A review of procedure FO-OP-004 was performed and documented.

Actions Taken to Prevent Recurrence

A log to track the reviews of Radwaste procedures has been generated to ensure the two-year review requirement is met.

Date of Full Compliance

Full compliance has been achieved at this time.

VIOLATION D (Severity Level V; Supplement V)

Description of Violation (86-05-04)

10 CFR 71.12(a) permits a general license to be issued to any licensee of the Commission to transport, or deliver to a carrier for transport, licensed material in a package for which a certificate of compliance has been issued by the NRC. 10 CFR 71.12(c)(1) states, in part, that this general license applies only to a licensee who has a copy of the certificate of compliance and has the drawings and other documents referenced in the approval relating to the use and maintenance of the packaging and to the actions to be taken prior to shipment.

Contrary to the above, on April 23, 1985, the licensee delivered to a carrier for transport 29.14 Curies of licensed material in a package, Model No. CNS 6-80-2, Certificate of Compliance (C of C) No. 9111, and although the licensee had a reduced copy of a drawing, it could not be verified as the referenced drawing because the drawing identification number was not legible.

Admission or Denial of Violation

Duquesne Light Company denies Violation 86-05-04.

Discussion

In order to determine if the reduced copy of the drawing in question was the referenced drawing for package Model No. CNS 6-80-2, C of C No. 9111, another copy of the referenced drawing (C-110-D-0028 Rev. A) was obtained. Upon receipt, we were able to verify that the copy of the drawing kept by the RadWaste Coordinator at Beaver Valley Unit 1 was indeed the correct drawing. This fact was again verified by Quality Assurance personnel as part of a recent QA audit (BV-1-86-08).

Since a copy of the referenced drawing was, in fact, in our possession, there was no violation of the requirements of 10 CFR 71.12(c)(1). Therefore, we respectfully request that this violation be withdrawn.