

APPENDIX A

NOTICE OF VIOLATION

Consolidated Edison Company
Indian Point Nuclear Generating Station

Docket No. 50-247
License No. DPR-26

As a result of the inspection conducted on January 6-10, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

10 CFR 71.101(b), "Quality assurance requirements", states "Each licensee shall establish, maintain, and execute a quality assurance program satisfying each of the applicable criteria of this subpart, and satisfying any specific provisions which are applicable to the licensee's activities including procurement of packaging. The licensee shall apply the applicable criteria in a graded approach, and to an extent that is consistent with their importance to safety."

10 CFR 71.101(f), states, "A Commission-approved quality assurance program which satisfies the applicable criteria of Appendix B of 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."

Supplement I, Revision 1, CI-240-1, "Engineering Quality Assurance Manual," which establishes the licensee's required quality assurance program for radioactive material packages, states,

"Nuclear Power is responsible for all activities involving radioactive waste classification, characterization, including solidification (as applicable), selecting and labeling containers, and, use, maintenance, and repair of a package while it is within the Indian Point site boundary. Nuclear Power is also responsible for establishing a quality control program in accordance with 10 CFR 20.311 to assure compliance with the waste classification, characterization, processing, shipping and documentation requirements of 10 CFR 61.55, and 10 CFR 61.56"

Contrary to the above, as of January 10, 1986, the establishment and execution of the required quality assurance program was inadequate in that:

1. The quality control responsibilities of the Environmental Health and Safety personnel who are responsible for the shipment of radioactive material were not adequately specified.
2. The Environmental Health and Safety personnel were not trained in the responsibilities for quality control.

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3. The Implementing procedures did not adequately discuss the role of Environmental Health and Safety personnel in quality control.

This is a Severity Level IV violation (Supplement V).

Pursuant to the provisions of 10 CFR 2.201, Consolidated Edison Company, is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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