MAY 0 1 1986

Docket No. 50-219

GPU Nuclear Corporation ATTN: Mr. P. B. Fiedler Vice President and Director Oyster Creek Nuclear Generating Station P. O. Box 388 Forked River, NJ 08731

Gentlemen:

Subject: Inspection No. 85-25

We acknowledge receipt of your letter dated April 10, 1986, in response to our letter dated September 11, 1985.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

winni Signed T. Martin. has Division of Radiation Safety and Safeguards

cc: M. Laggart, BWR Licensing Manager Licensing Manager, Oyster Creek Public Document Room (PDR) Local Public Document Room (LPDR) Nuclear Safety Information Center (NSIC) NRC Resident Inspector State of New Jersey

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GPU Nuclear Corporation

bcc: Region I Docket Room (with concurrences) Management Assistant, DRMA Section Chief, DRP

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RI:DRSS Bellamy

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GPU Nuclear Corporation

Post Office Box 388 Route 9 South Forked River, New Jersey 08731-0388 609 971-4000 Writer's Direct Dial Number:

See.

April 10, 1986

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

Dear Dr. Murley:

Subject: Oyster Creek Nuclear Generating Station Docket No. 50-219 IE Inspection 85-25 dated September 11, 1985

As suggested by the subject inspection report, Attachment I of this letter updates our September 24, 1979 response to I&E Bulletin 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial".

As you are aware, since our original response to I&E Bulletin 79-19, an organizational change altered the department responsible for the radwaste packaging and shipping functions. Previously the responsibility was under the direction and control of the Radiation Protection Department. The present shipping organization is under the control and direction of the Manager of Radwaste Operations. Thus, the commitment to I&E Bulletin 79-19 Item 5 is being revised to reflect current training programs. We understand that this item will be reviewed during a subsequent inspection.

Should you require any further information, please contact Brenda Hohman, Oyster Creek Licensing Engineer at (609)917-4642.

Very truly yours,

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Vice President and Director Oyster Creek

PBF/BH/dam(0103A) Attachment

cc: Mr. Jack N. Donohew, Jr. U.S. Nuclear Regulatory Commission 7920 Norfolk Avenue, Phillips Bldg. Bethesda, MD 20014 Mail Stop No. 314

> NRC Resident Inspector Oyster Creek Nuclear Generating Station

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ATTACHMENT I

Revised Response to NRC I&E Bulletin 79-19

Item 1

Maintain a current set of DOT and NRC regulations concerning the transfer, packaging, and transport of low-level radioactive waste material.

Response

A current set of Department of Transportation (49 CFR) and Nuclear Regulatory Commission (10 CFR) regulations concerning the transfer, packaging, and transport of low-level radioactive waste material is maintained at the Oyster Creek Station in the Radwaste Shipping Department.

Item 2

Maintain a current set of requirements (license) placed on the waste burial firm by the Agreement State of Nevada, South Carolina, or Washington before packaging low-level radioactive waste material for transfer and shipment to the Agreement State licensee. If a waste collection contractor is used, obtain the appropriate requirements from the contractor.

Response

A current set of requirements (license) placed on the burial site operators by their respective states are maintained on site in the Radwaste Shipping Department.

Items 3

Designate, in writing, people in your organization who are responsible for the safe transfer, packaging, and transport of low-level radioactive material.

Response

Personnel in the Oyster Creek Station organization who are responsible for the safe transfer, packaging, and transport of the low-level radioactive material and those personnel qualified and authorized to sign shipping papers for transportation of radioactive waste have been designated in writing. Revised Response to NRC I&E Bulletin 79-19

Item 4

Provide management-approved, detailed instructions and operating procedures to all personnel involved in the transfer, packaging, and transport of low-level radioactive material. Special attention should be given to controls on the chemical and physical form of the low-level radioactive material and on the containment integrity of the packaging.

Response

Management-approved operating procedures which are used in operations and in the transfer, packaging, and transport of radioactive material are provided.

Item 5

Provide training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements, and in your instructions and operating procedures for all personnel involved in the transfer, packaging, and transport of radioactive material. Maintain a record of training dates, attendees, and subject material for future inspections by NRC personnel.

Response

Training and periodic retraining in the DOT and NRC regulatory requirements are presently provided to Radwaste Operators, Rad Con Technicians, Station Services, and Radwaste Shipping Supervisors. The present Operations training program provides training and retraining on minimizing radioactive waste by those processes which generate wastes. A training program is administered for radwaste facility operators which covers Radwaste Operations including transfer, packaging, and shipping of radioactive material in the DOT, NRC, and waste burial requirements thereto. Personnel packaging DAW are bargaining unit personnel who are trained in the operations of the packaging as well as transfer and storage procedures. They are under the direct supervision of the Radwaste Shipping Supervisors who are training in all applicable regulatory criteria.

Item 6

Provide training and periodic retraining to Radwaste Operators who operate the processes which generate waste to assure that the volume of low-level radioactive waste is minimized and that such waste is processed into acceptable chemical and physical form for transfer and shipment to a low-level radioactive waste burial facility. Revised Response to NRC I&E Bulletin 79-19

Response

See response to Item 5.

Item 7

Establish and implement a management-controlled audit function of all transfer, packaging, and transport activities to provide assurance that personnel, instructions and procedures, and process and transport equipment are functioning to ensure safety and compliance with regulatory requirements.

Response

A management-controlled audit function for the transfer, packaging, and transport of radioactive materials has been established and has been implemented. This function is provided by the Quality Assurance Department through the QA program development and audit sections.

Item 8

Perform, within 60 days of the date of this bulletin, a management-controlled audit of your activities associated with the transfer, packaging, and transport of low-level radioactive waste. Maintain a record of all audits for future inspections by NRC or DOT inspections. (Note: If you have an established audit function and have performed such an audit of all activities in items 1-6 within the past six months, this audit requirement is satisfied.)

Response

A management controlled audit of Radwaste Operations was conducted on March 7, 1979 (Audit No. 79-04) and have been conducted on an annual basis since the issuance of the I&E bulletin. In addition to annual audits conducted by the QC QA site audit section, routine inspections/monitoring of regular waste shipments are conducted by Operations QA monitors. Revised Response to NRC I&E Bulletin 79-19

Item 9

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Provide answers for 1978 and for the first six months of 1979 to the following questions:

 How many low-level radioactive waste shipments did you make? What was the volume of low-level radioactive waste shipped?

(Power reactor licensees who report this information in accordance with Technical Specifications do not need to respond to this question.)

2. What was the quantity (curies) of low-level radioactive waste shipped? What were the major isotopes in the low-level radioactive waste?

(Power reactor licensees who report this information in accordance with Technical Specifications do not need to respond to this question.)

3. Did you generate liquid low-level radioactive waste? If the answer is "yes", what process was used to solidify the liquid waste?

Response

- Reported in Semiannual Reports for the years since 1978, "Radioactive Effluent Releases."
- 2. Same as No. 1 above.
- Liquid low-level radioactive waste is generated. A process using lime and cement is presently used to solidify filter sludge and evaporator bottoms.

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