

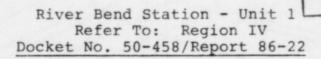
RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775

AREA CODE 504 635-6094 346-8651

September 19, 1986 RBG- 24432 File Nos. G9.5, G15.4.1

Mr. Robert D. Martin, Regional Administrator U.S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, TX 76011

Dear Mr. Martin:



This letter responds to the Notice of Violation and Notice of Deviation contained in NRC Inspection Report No. 50-458/86-22. The inspection was performed by Mr. R. E. Baer during the period June 30 through July 3, 1986 of activities authorized by NRC Operating License NPF-47 for River Bend Station Unit No. 1.

Gulf States Utilities Company's (GSU) response to the Notice of Violation 458/8622-01, "Transfer of Byproduct Material Containing Free Standing Water in Excess of Limits", and Notice of Deviation 458/8622-02, "Failure to Have a Solid Radwaste System Operational as Described and Depicted in the FSAR" are provided in the enclosed attachments. This completes GSU's response to the Notice of Violation and Notice of Deviation.

Sincerely,

W. J. Cahill, Jr. Senior Vice President River Bend Nuclear Group

JEB/ERG/JWC/ks

Attachments

cc: D. D. Chamberlain
U.S. Nuclear Regulatory (

U.S. Nuclear Regulatory Commission Region IV Senior Resident Inspector

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA

PARISH OF WEST FELICIANA

In the Matter of

GULF STATES UTILITIES COMPANY

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Docket Mos. 5G-458

(River Bend Station, Unit 1)

AFFIDAVIT

W. J. Cahill, Jr., being duly sworn, states that he is a Senior Vice President of Gulf States Utilities Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

W. J Cahill, Jr.

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this ____ day of _____, 19___.

Joan W. Middlebrooks Notary Public in and for West Feliciana Parish, Louisiana

My Commission is for Life.

Attachment 1

Response to Notice of Violation 50-458/8622-01

References

- Notice of Violation letter from H. G. Shealy, South Carolina Department of Health and Environmental Control to R. G. Easlick dated May 28, 1986 (enclosed).
- Response to Violation letter from J. E. Booker to H. G. Shealy dated June 17, 1986 (enclosed).
- 3. Acknowledge Receipt of Response letter from H. G. Shealy to J. E. Booker dated June 30, 1986 (enclosed).

Reason for the Violation

One of two containers of bead ion exchange resin solidified with cement shipped to the Barnwell Disposal Site was found to contain free standing liquid in excess of that allowed by regulations. The solidification process used by River Bend Station's waste processing contractor, Chem-Nuclear System, Inc., was performed in accordance with an accepted process control program. GSU, in conjunction with Chem-Nuclear System, Inc., has investigated the problem and determined the cause to be:

- 1. Inadequate mixing of the resin beads with the solidification media in the lower section of the process container. A proprietary chemical used to enhance flow within the process container had been eliminated due to non-desirable foaming. It appeared that even without the flow enhancing chemical there was adequate mixing action.
- Chem-Nuclear had experienced some difficulty in agitation but failed to ensure the final product was in-fact homogeneous and free of drainable liquid.

Corrective Steps Which Have Been Taken and the Results Achieved

1. Chem-Nuclear has designed and satisfactorily tested a new mixing blade assembly and conducted two full scale solidification tests with the same type and volume of resin bead that was previously processed at River Bend Station. The complete product billets from these tests have been removed from their test container and samples taken from all areas of the billet, inspected for homogeneity and tested for compressive strength. Results were satisfactory.

- 2. All containers processed with the old mixing blade assembly and still remaining at River Bend have been drilled, checked for free standing liquid and re-sealed prior to shipment. All were found to be acceptable.
- 2. Each of the next ten solidified liners have been sounded for voids, drilled to check for free standing liquid and re-sealed prior to shipment. Two of the next 10 liners were checked in a similar manner. All solidified liners checked to date have been found to be acceptable.

Corrective Steps Which Will Be Taken To Avoid Further Violations

Two more of the next 10 liners will be checked according to the above described procedure. If all liners checked in this manner are found to be acceptable, on-site puncture of the waste containers will be discontinued. If any are found to be unacceptable, reassessment of the solidification process will be performed and this sampling procedure will be repeated.

Date When Full Compliance Will Be Achieved

GSU received a letter from the State of South Carolina (Ref. 3) indicating that the corrective measures were satisfactory and restoring access privileges. The last onsite puncture check should be completed before October 1, 1986.

South Carolina Department of Health and Environmental Control

2600 Bull Street Columbia, S.C. 29201

Commissioner Robert S. Jackson, M.D.



Board

Moses H. Clarkson, Jr., Chairman Gerald A. Kaynard, Vice-Chairman Oren L. Brady, Jr., Secretary Barbara P. Nuessle James A. Spruill, Jr. William H. Hester, M.D. Euta M. Colvin, M.D.

May 28, 1986

CERTIFIED MAIL

Mr. Ralph Easlick
Radwaste Supervisor
Gulf States Utilities
River Bend Station
P.O. Box 220
St. Francisville, Louisiana 70775

Dear Mr. Easlick:

An investigation conducted on May 23, 1986, by the South Carolina Department of Health and Environmental Control revealed that a shipment of radioactive waste received at the Chem-Nuclear Systems, Inc. burial facility in Barnwell, South Carolina was in noncompliance with applicable state and federal regulations.

The violation is identified as follows:

Radioactive Waste Shipment No. 0586-126-A, classified as Radioactive Material, LSA, n.o.s., described as resin solidified with cement, packaged in 2 steel liners, transported as Exclusive Use on a flatbed trailer was found to contain liquid in excess of the limit specified by Condition 32.B of S.C. Radioactive Material License 097, Amendment 41, issued to Chem-Nuclear Systems, Inc. This constitutes a violation of Section 1.2, Department Regulation 61-83.

Please be informed that pursuant to Section 13-7-180, S.C. Code of Laws, 1976 (as amended) and Section 7.3 of the Department's Regulations for the Transportation of Radioactive Waste Into or Within South Carolina, you are hereby assessed a civil penalty of One Thousand Dollars (\$1,000.00).

In addition to the civil penalty, shipments of solidified resin from your facility are hereby prohibited from being transported into or delivered to this state until such time as you demonstrate to the Department that adequate measures have been implemented to ensure compliance with all applicable provisions of federal and state law.

Mr. Ralph Easlick Page Two May 28, 1986

If you do not wish to appeal this decision, payment of the civil penalty shall be submitted no later than June 17, 1986 and made payable to the "S.C. Department of Health and Environmental Control". Information concerning corrective measures and procedural modifications shall be submitted accordingly.

You are entitled to a full administrative hearing upon request and are allowed 20 days to make such application. However, should you wish to discuss this matter with us in an informal setting, representatives of this Bureau will be made available to meet with you at a mutually convenient time. Should you desire such a conference or wish to request a formal administrative hearing, please contact Mr. Virgil R. Autry of the Bureau of Radiological Health, (803) 758-5548.

Very truly yours,

Heyward G. Shealy, Chief

Bureau of Radiological Health

HGS: VRA: kn

cc: Mr. R. Lewis Shaw, Deputy Comm. DHEC Env. Quality Control

Samuel L. Finklea, III, Esq. DHEC Legal Counsel

Mr. David Reid, Exec. Asst. Office of the Governor

Mr. Robert Trojanowski USNRC, Region II

RIVER BEND STATION POST OFFICE BOX 220 ST. FFIANCISVILLE, LOUISIANA 70775

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June 17, 1986 RBG- 23863

Mr. Heyward G. Shealy, Chief Bureau of Radiological Health South Carolina Department of Health and Environmental Control 2600 Bull Street Columbia, South Carolina 29201

Dear Mr. Shealy:

File No. G1.11.2 State Permits and Licenses

Gulf States Utilities Company (GSU), as holder of South Carolina Radioactive Waste Transport Permit No. 0232-17-86-X for its River Bend Station, provides the following response to the violation identified in your letter of May 28, 1986.

One of two containers of bead ion exchange resin solidified with cement shipped to the Barnwell Disposal Site was found to contain free standing liquid in excess of that allowed by your regulations. The solidification process used by River Bend Station's waste processing contractor, Chem-Nuclear System, Inc., was performed in accordance with an accepted process control program. GSU, in conjunction with Chem-Nuclear System, Inc., has investigated the problem and determined the cause to be:

- Inadequate mixing of the resin beads with the solidification media in the lower section of the process container. A proprietary chemical used to enhance flow within the process container had been eliminated due to non-desirable foaming. It appeared that even without the flow enhancing chemical there was adequate mixing action.
- Chem-Nuclear had experienced some difficulty in agitation but failed to ensure the final product was in-fact homogeneous and free of drainable liquid.

GSU, in conjunction with Chem-Nuclear Systems, Inc., has taken the following corrective action to prevent any recurrence:

1. All processed containers still remaining at River Bend will prior to shipment.

- 2. Chem-Nuclear has designed and satisfactorily tested a new mixing blade assembly and conducted two full scale solidification tests with the same type and volume of resin bead that was previously processed at River Bend Station. The complete product billets from these tests have been removed from their test container and samples taken from all areas of the billet, inspected for homogenity and tested for compressive strength. Results were satisfactory.
- 3. Each of the next ten solidified liners will be sounded for voids, drilled to check for free standing liquid and re-sealed prior to shipment. Then 1 of 5 liners will be checked until an additional four are satisfactory. If all of liners checked in this manner are found to be acceptable, onsite puncture of the waste containers will be discontinued. If any are found to be unacceptable, reassessment of the solidification process will be performed and this sampling procedure will be repeated.

Please find enclosed a check in the amount of the civil penalty assessed. We regret the violation and are confident that the corrective measures described herein will ensure compliance with your regulations.

Sincerely,

J. E. Booker

Manager-Engineering, Nuclear Fuels & Licensing River Bend Nuclear Group

Enclosure

JEB/WJR/JWC/je

South Carolina Department of Health and Environmental Control RBC-34517

2600 Bull Street Columbia, S.C. 29201

Commissioner
Robert S. Jackson, M.D.



Board

Moses H. Clarkson, Jr., Chairman Gerald A. Kaynard, Vice-Chairman Oren L. Brady, Jr., Secretary Barbara P. Nuessle James A. Spruill, Jr. William H. Hester, M.D. Euta M. Colvin, M.D.

> 69.5 61.11.2

June 30, 1986

Mr. J.E. Booker, Manager Engineering, Nuclear Fuels & Licensing Gulf States Utilities P.O. Box 2951 Beaumont, Texas 77704

Dear Mr. Booker:

This is to acknowledge receipt of your letter dated June 17, 1986, pertaining to your corrective action to ensure that shipments of radioactive waste into the State are in compliance with all applicable requirements. Further, we acknowledge payment of the civil penalty.

Please be advised that we have reviewed your corrective measures and find them satisfactory to the Department. We anticipate that all future shipments will conform to these measures and comply with all applicable state and federal regulations.

We appreciate your continued cooperation.

Very truly yours,

Heyward S. Shealy

Heyward G. Shealy, Chief Bureau of Radiological Health

VRA: kn

Nuclear Document Control

JUL 18 1986

RECEIVED BY

JUL 1 1986

NUCLEAR LICENSING SITE

Attachment 2

Response to Notice of Deviation 50-458/8622-02

Reason for the Deviation

. . .

inspector found that the waste compactor and sample collection system has not been installed, waste is not processed through the waste sludge tank system, and the waste stream is not sampled prior to delivery to the portable solidification system described in the Final Safety Analysis Report (FSAR). Due to changes in regulations concerning processing and disposal of dry active waste (DAW), alternate plans concerning segregation and compaction have been under evaluation. Installation of the DAW compactor was put on hold by GSU until plans concerning DAW processing were completed. Construction of portions of the solid waste system was deferred prior to receipt of the operating An alternate path was installed from the separator tanks and backwash tank directly to the solid waste vendor's solidification equipment and has been used while the waste sludge tank was not available. This alternate flow path is described in FSAR section 11.2.2. Operation of the waste sludge tank is on hold pending completion of the sample collection system.

Corrective Steps Which Have Been Taken and the Results Achieved

A modification request has been generated for the installation of the compactor on elevation 106 of the Radwaste Building. The waste sludge tank installation is complete with the exception of the sample collection system and system testing. Engineering is complete with operation on hold until the sample collection system equipment is delivered by the vendor and installed.

Corrective Steps Which Will Be Taken to Avoid Further Deviations

The equipment described in the FSAR either has been installed or is scheduled for installation.

Date When Full Compliance Will Be Achieved

Installation of the DAW compactor is scheduled for completion by October 10, 1986. Installation of the sample collection system is scheduled for completion by the end of this year. System testing and operation will commence thereafter.