Docket No. 50-146

Saxton Nuclear Experimental Corporation ATTN: Mr. R. W. Heward, Jr. President 1 Upper Pond Road Parsippany, New Jersey 07054

Gentlemen:

This refers to your letter dated September 24, 1986 to the NRC's Office of Nuclear Reactor Regulation (NRR), Attn: Document Control Desk, in which you provided a proposed mailing list for all Saxton related correspondence. Based on recent discussions with the NRR project manager for the Saxton reactor facility, we understand that your proposed mailing list for Saxton correspondence has been incorporated by NRR into their service list for outgoing licensing-related correspondence.

Also, with respect to inspection-related correspondence, we have added each of the addressees on your proposed mailing list, except the Saxton Community Library, to our external document distribution service list for the Saxton reactor facility. Please note that the Saxton Community Library is the designated local public document room (LPDR) for Saxton and, as such, already receives inspection-related, as well as other, docketed Saxton correspondence. Furthermore, any incoming correspondence, such as letters from yourself to the NRC, are routinely copied and sent to the PDR and LPDR, but are not copied by the NRC for service list distribution.

Accordingly, we are sending a copy of this letter to each addressee listed on the enclosed Saxton Reactor Facility Service List for NRC Region I outgoing correspondence. In addition, we are providing each Service List addressee a copy of an NRC Region I letter dated December 12, 1986 and its enclosures regarding Inspection 50-146/86-02 at the Saxton reactor facility. If any of the service list addressees wish to correct their mailing address, or if they do not want to receive similar inspection-related (or other) NRC correspondence, they should contact me by letter to this office or by telephone at (215) 337-5378.

Sincerely,

Original Signed By:

Thomas C. Elsasser, Chief Reactor Projects Section 3C Division of Reactor Projects

Enclosures: As Stated

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cc w/o encls:
G. G. Baker, Plant Manager
R. J. McGoey, Manager, PWR Licensing, GPU Nuclear Corporation
J. Tydeman, Concerned Citizens for SNEC Safety
Saxton Reactor Facility Service List (w/encls)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania

bcc w/o encls: Region I Docket Room (with concurrences) DRP Section Chief R. E. Carter, PM, PBSS, NRR K. Abraham, PAO Robert J. Bores, DRSS

Haverkamp/meo 12/22/86 RI:DSP Elsasser

Wenzinger

OFFICIAL RECORD COPY

ENCLOSURE

SAXTON REACTOR FACILITY SERVICE LIST

U.S. Army Corps of Engineers Baltimore District ATTN: S. Snarski/P. Juhle P. O. Box 1715 Baltimore, Maryland 21203

Pennsylvania Department of Environmental Resources Bureau of Radiation Protection ATTN: Ms. Margaret A. Reilly P. O. Box 2063 Harrisburg, Pennsylvania 17120

Pennsylvania Department of Environmental Resources Bureau of Water Quality Control ATTN: Mr. James Flesher One Ararat Boulevard Harrisburg, Pennsylvania 17110

Mr. Joseph Clapper, Chairman Bedford County Commissioners County Court House 230 South Juliana Street Bedford, Pennsylvania 15522

Mr. Larry Sather, Chairman Huntingdon County Commissioners County Court House Huntingdon, Pennsylvania 16652 Mr. D. Bud McIntyre, Chairman Broad Top Township Supervisors Broad Top Municipal Building Defiance, Pennsylvania 16633

Carbon Township Supervisors ATTN: Ms. Penny Brode Secretary RD #1, Box 222-C Saxton, Pennsylvania 16678

Hopewell Township Supervisors ATTN: Ms. Sally Giornesto Secretary 511 Tenth Street Saxton, Pennsylvania 16678

Mr. Don Weaver, Chairman Liberty Township Supervisors RD #1 Saxton, Pennsylvania 16678

Saxton Borough Council
ATTN: Ms. Peggy Whited
Secretary
9th and Spring Streets
Saxton, Pennsylvania 16678



NUCLEAR REGULATORY COMMISSION

REGION

KING OF PRUSSIA, PENNSYLVANIA 19406
DEC 12 1986

Docket No: 50-146

Saxton Nuclear Experimental Corporation

ATTN: Mr. R. W. Heward, Jr.

President
1 Upper Pond Road
Parsippany, New Jerse

Parsippany, New Jersey 07054

Gentlemen:

Subject: Inspection Report No. 50-146/86-02

A routine, announced inspection was conducted on November 6, 7, and 10, 1986, of records and radiological monitoring activities associated with the Saxton Nuclear Experimental Corporation reactor site.

This inspection indicated that one of your activities was in apparent violation of NRC requirements. Details are provided in the enclosured Appendix A. You are required to respond to this finding by following the instructions included in Appendix A.

Your cooperation with us is appreciated.

Sincerely,

Thomas T. Martin, Director
Division of Radiation Safety
and Safeguards

m. Stanbuky

Enclosures:

1. Appendix A, Notice of Violation

2. NRC Region I Inspection Report 50-146/86-02

cc w/encls:

G. G. Baker, Plant Manager

R. J. McGoey, Manager, PWR Licensing

J. Tydeman, Concerned Citizens for SNEC Safety

Public Document Room (PDR)

Local Public Document Room (LPDR)

Nuclear Safety Information Center (NSIC)

Commonwealth of Pennsylvania

261219 JP.

APPENDIX A

NOTICE OF VIOLATION

Saxton Nuclear Experimental Corporation (SNEC)

1 Upper Pond Road

Parsippany, New Jersey 07054

Docket No. 50-146 License No. DPR-4

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

Technical Specification section 5, Reports, requires, in part, that SNEC shall submit to the NRC "...a report of any occurrence of a possible unsafe condition relating to the facility or to the public. For each occurrence, SNEC shall promptly, within 24 hours of discovery, notify by telephone or telegraph the Director of Region I, Office of Inspection and Enforcement, and shall submit a written follow-up report within 15 days which describes the circumstances and corrective actions taken".

Technical Specifications section 5.a.3 requires that such a report shall include "...any confirmed analysis of residual water from the Containment Vessel or Radioactive Waste Disposal Facility which indicates that the activity concentration is above the limits of Table II, 10 CFR Part 20 for unrestricted release".

Contrary to the above, 15 day written reports for three Containment Vessel sump water samples with activity concentrations above the limits of 10 CFR 20 Appendix B Table II were not submitted to the NRC as required. Specifically, Containment Vessel sump samples collected on May 13, 1982, June 14, 1983, and February 7, 1986, each showed isotopic concentrations of Cs-134, Cs-137, and Sr-90 greater than the unrestricted release concentrations of 10 CFR 20 Appendix B Table II. No written reports were submitted to the NRC as required.

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

Pursuant to the provisions of 10 CFR 2.201, Saxton Nuclear Experimental Corporation 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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U.S. NUCLEAR REGULATORY COMMISSION REGION I

Report No.	86-02			
Docket No.	50-146			
License No.	DPR-4	Priority	Categor	ry
Licensee:	1 Upper Pond	r Experimental Cor Road ew Jersey 07054	poration/GPU Corpo	pration
Facility Nam	me: Saxton Re	actor		
Inspection A	At: Saxton, P	ennsylvania and TM	I EOF, Harrisburg	, Pennsylvania
Inspection (Conducted: No	vember 6, 7, and 1	0, 1986	
Inspector:	a. Weadock	Cock Radiation Special	ist	12/11/86
Approved by	: M. Shanbaky	hankaky, chief, Facilitie Section, EPRPB		12/4/86 date

Inspection Summary: Inspection on November 6, 7, and 10, 1986 (Report
No. 50-146/86-02).

<u>Areas Inspected</u>: Announced, routine inspection by one region-based inspector of the decommissioned Saxton facility. Areas reviewed included procedures, records, and facility upkeep and radiological monitoring activities.

Results: One apparent violation, concerning a failure to make required notifications to the NRC, was identified. (Section 3.0)

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Details

1.0 Persons Contacted

1.1 Licensee Personnel

J. Auger - GPUN/SNEC - PWR Licensing Engineer

G. Baker - SNEC General Manager

W. Craft III - SNEC Radiation Safety Officer
J. Garry - GPUN Environmental Controls

1.2 NRC Personnel

M. Shanbaky, Chief, Facilities Radiation Protection Section, EPRPB

A. Weadock, Radiation Specialist

2.0 Purpose

This was a preliminary inspection of records and radiological monitoring activities associated with the Saxton Nuclear Experimental Corporation (SNEC) reactor site. This inspection was performed to review the current status of the Saxton site and ongoing custodial duties and monitoring activities. Areas reviewed included:

- procedures and records,
- site monitoring activities.

3.0 Procedures and Records

On November 6, 1986, the inspector performed a review of Saxton site procedures, radiological surveys, and records maintained at the Three Mile Island Emergency Offsite Facility (EOF) in Harrisburg, Pennsylvania. During the course of this review one apparent violation, concerning a failure to make required notifications to the NRC, was identified.

Licensee Technical Specifications (T.S.) section 5, "Report", requires the licensee to notify the NRC of any occurrence of a "possible unsafe condition". Such notification should be made by telephone or telegraph within 24 hours of discovery, followed up by a written report within 15 days. Technical Specifications section 5.a.3 requires such notification be made after any confirmed analysis of residual water from the Containment Vessel indicates activity concentration above the limits of Table II, 10 CFR 20 limits for unrestricted release.

Review of radiological analysis results contained in the licensee's annual status reports indicated that, when present, water in the Containment Vessel sump generally exceeded 10 CFR 20 activity concentration limits for

unrestricted release. Cross-checking of licensee analysis results against notification reports to the NRC indicated that the required 15 day written notification report was not submitted to the NRC for the following Containment Vessel sump samples:

- A May 13, 1982 sample, identified in an addendum to the licensee's 1982 status report,
- A June 14, 1983 sample, identified in the licensee's 1983 annual report.
- 3. A February 7, 1986 sample.

Analysis results for these samples and the corresponding 10 CFR 20 Appendix B Table II limits are included in attachment 1.

Failure to make the required 15 day written notification for the above samples constitutes an apparent violation of Technical Specification section $5.a.3 \ (146/86-02-01)$.

The inspector stated to the licensee that the potential for the above violation was identified in an internal licensee audit, completed in May, 1981, which identified that the licensee was not performing all analyses or making required reports to the NRC.

The Saxton General manager provided the following additional information concerning the above analyses:

- 1. The May, 1982 sample was collected prior to the "official" 1982 second quarter facility surveillance, performed in June, 1982. The General Manager indicated that sample results may not have been reported since personnel at that time may have thought only the "official visit" samples were required to be reported.
- Internal telephone logs indicate that sample results for the June, 1983 sample were communicated by phone to the individual responsible for making reports to the NRC; however, the report apparently was then never generated.
- 3. The licensee produced an internal file memo indicating that the results of the February 7, 1986 sample were communicated by phone to the NRC on February 20, 1986. Although this memo indicates that a 15 day written notification report would be sent to the NRC, apparently no further action was taken.

The licensee also indicated that increased attention is now paid by both GPUN Environmental Controls and Licensing staff to insure all required notifications are made to the NRC.

The inspector also noted during reviews of Saxton annual status reports that the reported lower limit of detection (LLD) for Sr-90 was often greater than the 10 CFR 20 Appendix B Table II limit for unrestricted release. The licensee indicated that Saxton water samples were counted twice after collection; once by the TMI Unit 2 chemistry laboratory, followed by analysis at Teledyne, the licensee's vendor laboratory. The licensee indicated that the LLD's included in the annual report were for the TMI laboratory, and that the subsequent analysis of samples at Teledyne was performed at substantially improved sensitivities such that all 10 CFR 20 limits could be detected. The licensee indicated, however, that a list of required LLD's would be submitted to the TMI Unit 2 lab to insure all preliminary analyses were sensitive enough to detect 10 CFR 20 limits. This memo was issued during the course of this inspection. The inspector had no further questions in this area.

The inspector also reviewed surveys and facility inspection checklists from the completed quarterly site surveillances for 1986, 1985, and 1984. No problems were noted and the licensee appeared to be meeting the requirements of their Technical Specifications and procedure 9400-SUR-4523.01, "Quarterly Facility Inspection Procedure". The inspector noted that, although not required by their Technical Specifications, the licensee has been implementing a Radiological Environmental Monitoring Program (REMP) around the environs of the Saxton site. The inspector received copies of REMP monitoring results for 1982, 1983, and 1984 during this inspection. Although time did not permit during the course of this inspection, these results will be reviewed and reported on during a subsequent inspection report (146/86-02-02).

4.0 Site Monitoring Activities

On November 7, 1986, the inspector toured the Saxton site in Saxton, Pennsylvania and observed licensee quarterly surveillance activities. The majority of radiological survey activities were performed in the Containment Vessel; radiation and contamination levels were surveyed on the operating level as required. A physical and radiological examination was also made of the HEPA filter installed on the containment breather pipe. The inspector noted that radiation levels were generally non-detectable on the operating level of the Containment Vessel. Contamination levels were generally also not detectable on this level, except for minimal levels found at the access area to the Containment Vessel lower levels.

Licensee surveillance activities also included verification of the physical security of the site, tour of the buildings, and taking of water samples from the RWDF basement and pipe tunnel. The inspector noted that the condition of the auxiliary buildings at the site was generally very poor, due to age and weathering. In particular, the Control and Administration building was in an advanced state of disrepair; portions of the ceiling had fallen and there was evidence of wildlife infestation inside the building.

Duplicate water samples from the RWDF basement and pipe tunnel and a soil sample taken from outside the exclusion area fence west of the Filled Drum Storage Area were obtained for NRC analysis during this inspection. These results will be used for NRC review and comparison with the licensee's results only and do not represent or are intended to be part of a formal decommissioning sampling program.

Within the scope of the above review, no violations were noted. Licensee onsite surveillance and monitoring activities appears adequate to meet Technical Specification requirements and support the current level of site activities. The inspector noted, however, that the level of monitoring effort will have to be commensurately upgraded as the status of site activities switches from custodial upkeep to dismantlement.

Exit Meeting

The inspector met with licensee personnel denoted in Section 1 at the conclusion of the inspection on November 10, 1986. The scope and findings of the inspection were discussed at that time. During this meeting the licensee also discussed upcoming plans for pumping residual groundwater from the RWDF basement to the Raystown branch of the Juniata River. The licensee outlined sampling methodology and committed to informing the NRC Region I at the commencement of this activity.

Attachment 1
Results of Containment Vessel Sump Water Analysis
All results given in uCi/ml

Isotope	5/13/82 sample	6/14/83 sample	2/7/86 Sample	10 CFR 20, Appendix B* Table II, Col.2 limits
Cs-137	1.3E-3	1.3E-3	1.9E-3	2.0E-5(S)
Cs-134	2.2E-5	1.5E-5	1.1E-5	9.0E-6(S)
Sr-90	1.4E-5	4.8E-5	5.6E-5	3.0E-7(S)

^{*}Values listed are the more restricted between soluble (S) and insoluble (I) limits.

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