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June 19, 2000

Mr. David S. Wazenkewitz, P.E.  
New York State Department of  
Environmental Conservation  
615 Erie Blvd. West  
Syracuse, NY, 13204-2400

RE: New York Power Authority James A. FitzPatrick (JAF)  
Nuclear Power Plant - Storage of Sewage Sludge

Reference: Letter to J. Kahabka (NYPA) From D. Wazenkewitz (NYDEC)  
Dated 2/10/00

Dear Mr. Wazenkewitz:

This letter is a follow up to the meeting held at the New York State Department of Environmental Conservation's (NYSDEC) Albany office on April 11, 2000 and serves to summarize the results of the same. The meeting was held to address the issue of long term storage of sanitary sewage sludge at the FitzPatrick site, in excess of the 18 month limit specified in the 6 NYCRR Part 360.

As discussed at the meeting, sanitary sewage sludge generated at the facility contains licensed material associated with plant operation. The presence of the radioactivity in the material requires that additional controls be in place and also results in limited disposal options. While numerous scenarios were discussed for the storage and disposal of the material in accordance with 6 NYCRR Part 360 1.2.a(c), the Authority agrees with the collective position of the attendees that this material is regulated under the Nuclear Regulatory Commission operating license (DPR-59) for the FitzPatrick facility and the applicable sections of 10 CFR. Based on this interpretation, the subject material, therefore, is not subject to the 18 month storage limit specified in 6 NYCRR Part 360 1.2.a(c). Ultimately, the material will be disposed of in accordance with all applicable federal and state regulatory requirements.

Operationally, the sludge will be placed in the drying beds for dewatering and volume reduction. Once the sludge moisture content has been reduced, the dry material will be removed from the drying beds and placed into numbered secured storage containers. When the storage containers are filled, representative samples of the material will be taken. This sample will be analyzed to determine radionuclide content and concentrations. This data will be logged and the sample retained for future long-term analysis. The Authority will maintain a record of the sampling results corresponding to

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the stored material. These containers will then be placed into secured long-term storage. The Authority will re-analyze the archived samples through time to determine the radionuclide concentration. This process will be repeated until such time as the radioactive material has undergone sufficient radioactive decay to allow for the disposal of the sewage sludge. Historically, the sanitary waste stream to the onsite sanitary wastewater treatment facility has resulted in the generation of approximately 20 cubic yards of wet pressed sludge on an annual basis. The operation of the newly installed drying beds is anticipated to reduce the annual volume by 50%.

If you have any questions please call me at (914) 681-6308 or Barrie Gorman at (315) 593-5740.

Sincerely,



John M. Kahabka  
Supervisor  
Environmental Programs

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