



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

April 30, 1984

TO ALL OPERATING REACTORS AND APPLICANTS FOR OPERATING LICENSES

Gentlemen:

SUBJECT: COMPLIANCE WITH 10 CFR PART 61 AND IMPLEMENTATION OF THE
RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS (RETS) AND
ATTENDANT PROCESS CONTROL PROGRAM (PCP) (GENERIC LETTER 84-12)

This letter is to inform you that the waste manifest provisions of 10 CFR 20.311 became effective on December 27, 1983. The manifest system is closely related to certain requirements of 10 CFR Part 61 that place new requirements on classification and acceptable forms for low-level radioactive wastes being shipped from commercial nuclear power plants to commercial disposal facilities. The NRC staff has been made aware of the fact that neither the states nor the disposal facility operators currently have sufficient resources to assure that all incoming low-level radioactive waste is in compliance with these new regulations. Consequently, the NRC has been asked to provide reasonable assurance that its licensees are complying with all applicable provisions of Part 61.

During the development of Part 61, the NRC staff determined that compliance with the radioactive waste form requirements of Part 61 and the certification requirements of 10 CFR 20.311 could be achieved by the development and use of a Process Control Program (PCP) as an attendant part of the licensee's Radiological Effluent Technical Specifications (RETS). This approach was determined to be acceptable by the responsible state regulatory agencies that license the disposal sites. It is now apparent, however, that many licensees do not yet have approved PCPs and that no licensee has a PCP which specifically addresses the new requirements of Part 61.


As an interim measure, the responsible state regulatory agencies and the disposal site operators have agreed to continue to accept nuclear power plant low-level radioactive wastes based upon the NRC staff's assurance that reasonable progress is being made toward demonstration of full compliance with new requirements of Part 61 and Part 20. The NRC staff has been readily able to offer such assurances for those plants for which there are NRC approved and implemented RETS and the attendant PCPs. The NRC staff will assume a good-faith effort on the part of these licensees to modify in a timely fashion the PCPs to accommodate all new and applicable Part 61 and Part 20 requirements. We are prepared to assist, when requested, those licensees which presently have approved PCPs to assure that they are upgraded to meet the new requirements of Part 61; however, the NRC staff cannot offer the same type of assurances for those operating plants which do not possess currently approved RETS and PCPs. Prompt action may be necessary if radioactive waste shipments from these plants are to continue without interruption.

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- 2 -

The NRC staff will make every effort to avoid any interruption of low-level radioactive waste shipments by its licensees. We are prepared to expedite the implementation of NRC approved RETS and PCPs for all licensees who request assistance.

If you have any questions concerning this subject, please contact either W. Gammill or F. Congel via your Project Manager.


Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation