

POWER AUTHORITY OF THE STATE OF NEW YORK  
INDIAN POINT NO. 3 NUCLEAR POWER PLANT

P. O. BOX 215 BUCHANAN, N. Y. 10511

TELEPHONE: 914-739-8200



September 24, 1979  
IP-WDH-5719

Docket No. 50-286  
License No. DPR-64

Boyce H. Grier, Director  
Office of Inspection and Enforcement  
Region I  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

I.E. Bulletin No. 79-19

Dear Mr. Grier:

Enclosed is our detailed response to Items 1 - 8 of Bulletin  
79-19.

Very truly yours,

*J. P. Bayne*  
J. P. Bayne

WDH/rbb

Attachment

cc: Office of Inspection and Enforcement  
Division of Fuel Facility and  
Materials Safety Inspection  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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ATTACHMENT

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

RESPONSE

The Indian Point 3 Radiological and Environmental Services Department maintains a subscription to Dato Mation Incorporated, P.O. Box 4302, Charleston, South Carolina 29405 for the radioactive materials shipping manual. This subscription provides timely updates to all changes of 10 CFR 71, 49 CFR and 39 CFR regarding transport of radioactive material.

In addition, this service provides an update on all State and non Federal regulations relating to transport of radioactive materials. Our current contractor for transport of radioactive waste, Hittman Nuclear Co. also provides to us revisions and changes in the regulations for burial at the Barnwell, South Carolina site. To date, all shipments of radioactive wastes from Indian Point 3 have been sent to Barnwell, South Carolina.

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

The Hittman Nuclear Co. is presently contracted as shipper for solid radioactive waste from Indian Point 3 and provides Indian Point 3, the licensee, with any revisions to the licenses for the burial facilities used for waste shipped from this facility. In this matter, we receive this information essentially at the same time as the shipper. This information is maintained on file with the DOT and NRC regulations identified in Item 1 above.

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

## RESPONSE

At the Indian Point 3 facility the Radiological and Environmental Services Superintendent is designated as the radiation protection manager for the site, as defined in Regulatory Guide 1.8. This individual is responsible for the safe transfer, packaging and transport of low level radioactive material. Although this responsibility is delegated to others within the RES organization, the ultimate responsibility still remains in the position of the radiation protection manager.

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

Procedures issued by the Health Physics Department and by the Operations Department at Indian Point 3 are provided for all transfer, packaging and transport of low level radioactive material.

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

All personnel who are trained in Health Physics Procedures for transfer, packaging and transport of radioactive material are trained in DOT and NRC regulations through their inclusion in Health Physics Procedures. All personnel who are trained in these procedures sign a statement to the effect that they have reviewed the procedure with the date on which they have been trained and if they have any comments on the procedure, this is also documented. These sign off sheets are maintained in the RES office.

All operating personnel are trained in procedures relating to radioactive waste and this training is documented on check off lists maintained by the Operations Department.

All work involved with radioactive waste is covered under a Radiation Exposure Authorization (REA) and all people working under this permit are required to sign, signifying their familiarity with the requirements of the permit.

6. Provide training and periodic retraining to those employees 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.

RESPONSE

All employee training concerning radioactive waste points out the importance of minimizing waste to the maximum extent practicable. However, a specific program will be developed by December 31, 1979, for those employees who operate the processes which generate waste. Implementation of this program will begin following the outage.

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

The QA Department has established and will implement an audit function on transfer, packaging and transport activities of low level radioactive waste material.

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 inspectors. (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

The QA Department has scheduled audits to be performed by October 10, 1979, of the Authority's activities associated with Items #1 through #6 of this bulletin.

- 9.3. Did you generate liquid low-level radioactive waste?

RESPONSE

No. Liquid low-level radioactive waste from Indian Point 3 is processed by Con Edison's facilities in accordance with Memorandum of Understanding No. 15, Rules Governing the Receipt, Processing and Discharge of Liquid Waste by Consolidated Edison and the Power Authority.