

Effluent and Waste Disposal

Semi-Annual Report

January 1, 1998 - June 30, 1998

Facility Indian Point 3Licensee New York Power Authority

This information is provided in accordance with the requirements of Regulatory Guide 1.21. The numbered sections of this report reference corresponding sections of the subject Regulatory Guide, pages 10 to 12.

A. Supplemental Information1. Regulatory Limits

Indian Point 3 is presently subject to limits on radioactive waste releases that are set forth in sections 2.3.1, 2.3.2, 2.3.3, 2.4.1, 2.4.2, 2.4.3 and 2.4.4 of Appendix B to Docket No. 50-286 entitled "Environmental Technical Specification Requirements Part II Radiological Environmental" (ETSR). The percentages of the technical specification limits reported in Tables 1A and 2A are the percent of the quarterly limits specified in the ETSR. If more than one limit applies to the release, the most restrictive limit is reported.

2. Maximum Permissible Concentrationa) Fission and Activation Gases

The quarterly dose resulting from release of fission and activation gases is calculated in accordance with the methodology stated in the Offsite Dose Calculation Manual (ODCM). The specific isotopes listed in Table 1C are used to determine the effective dose factors for the time period.

b/c) Iodines, Tritium and Particulates

The quarterly organ dose limit for Iodine 131, tritium and particulates with half-lives greater than eight days is calculated in accordance with the methodology stated in the ODCM.

d) Liquid Effluents

The quarterly dose limit for liquid isotopic releases is calculated in accordance with the methodology stated in the ODCM. The concentration limit for noble gases dissolved in liquid releases is calculated based upon a maximum permissible concentration of $2.00E-4$ uCi/ml as required by section 2.3.1.A of the ETSR.

3. Average Energy

The average energies (\bar{E}) of the radionuclide mixtures in releases of fission and activation gases were as follows:

1st Quarter $\bar{E}_\beta = 2.61\text{E-}01$ Mev/dis $\bar{E}_\gamma = 4.78\text{E-}01$ Mev/dis

2nd Quarter $\bar{E}_\beta = 2.84\text{E-}01$ Mev/dis $\bar{E}_\gamma = 5.74\text{E-}01$ Mev/dis

4. Measurements and Approximations of Total Radioactivity

a) Fission and Activation Gases

Analysis of effluent gases has been performed in compliance with the requirements of Table 3.4-1 of the ETSR. In the case of isolated tanks (batch release), the total activity discharged is based on an isotopic analysis of each batch with the volume of gas in the batch corrected to standard temperature and pressure.

Vapor containment purge discharges that are less than 150 hours/quarter in duration have been treated as batch releases and Vapor Containment pressure relief discharges have been treated as continuous releases

(> 500 hrs/year and as defined in NUREG 0133, Section 3.3). At least one complete isotopic concentration analysis of containment air is performed monthly. This analysis is used in conjunction with a process monitor to obtain the isotopic mixture and quantification of each pressure relief. Isotopic analyses for each vapor containment purge are taken prior to and during the purge. This information is combined with the volume of air in each discharge to calculate the quantity of activity released from these discharges.

The continuous building discharges are based on weekly samples of ventilation air analyzed for isotopic content. This information is combined with total air volume discharged and the process radiation monitor readings to determine the quantity of activity from continuous discharges.

b/c) Iodines and Particulates

Iodine-131 and particulate releases are quantified by collecting a continuous sample of ventilation air on a TEDA impregnated, activated charcoal cartridge and a glass-fiber filter paper. These samples are changed weekly as required in Table 3.4-1 of the ETSR and the concentration of isotopes found by analysis of these samples is combined with the volume of air discharged during the sampling period to calculate the quantity of activity discharged.

For other iodine isotopes the concentration of each isotope is determined monthly on a 24-hour sample. The concentration of the isotopes found by analysis is combined with the volume of air discharged during the sampling period to calculate the quantity of activity discharged.

d) Liquid Effluents

A sample of each batch discharge is taken and an isotopic analysis is performed in compliance with requirements specified in Table 3.3-1 of the ETSR. This isotopic concentration data is combined with the information on volume discharged to determine the amount of each isotope discharged.

Proportional composite samples of continuous discharges are taken and analyzed in compliance with Table 3.3-1 of the ETSR. These concentration data are combined with the volume discharged to calculate the total activity discharged.

5. Batch Releases

a) Liquid

	<u>1998</u>	
	<u>1st Quarter</u>	<u>2nd Quarter</u>
Number of Batch Releases	14	27
Total Time Period Batch Releases (min)	1386	2755
Maximum " " " " "	109	111
Average " " " " "	99	102
Minimum " " " " "	75	94
Average Stream Flow (cfs)	Note: *	Note: *

Note: * This information is obtained from the Department of the Interior, U.S. Geological Survey, for the Hudson River. Due to the delays in obtaining this data from the governmental agency, flows will be submitted as they become available.

b) Gaseous

	<u>1998</u>	
	<u>1st Quarter</u>	<u>2nd Quarter</u>
Number of Batch Releases	3	12
Total Time Period Batch Releases (min)	170	358
Maximum " " " " "	80	88
Average " " " " "	57	30
Minimum " " " " "	35	3

6. Abnormal Releases

a) Liquid
None

b) Gaseous
None

7. Radiological Environmental Technical Specifications

The Radiological Environmental Technical Specifications (RETS) require reporting of prolonged outages of effluent monitoring equipment (Sections 2.1.C and 2.2.B) and significant changes in the land use census, Radiological Environmental Monitoring Program (REMP), or exceeding the total curie content limitations in outdoor tanks (Sections 2.8.A, 2.8.B, 2.7.C and 2.3.4.B).

During this reporting period, no required Technical Specification Effluent Monitoring equipment was out of service (OOS) for periods greater than 30 consecutive days.

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B. GASEOUS EFFLUENTS

FIRST AND SECOND QUARTERS, 1998

TABLE 1A
 EFFLUENT AND WASTE DISPOSAL SEMIANNUAL REPORT (Jan - Jun 1998)
 GASEOUS EFFLUENTS - SUMMATION OF ALL RELEASES

	UNIT	QUARTER 1st	QUARTER 2nd	EST. TOTAL ERROR %
A. Fission & Activation Gases				
1. Total Release	Ci	6.80E-02	7.13E-02	±25
2. Average release rate for period	uCi/sec	8.75E-03	9.06E-03	
3. Percent of technical spec. limit (Based on limiting gamma air dose)	%	3.40E-04	4.19E-04	
B. Iodines				
1. Total Iodine - 131	Ci	0.00E+00	0.00E+00	±25
2. Average release rate for period	uCi/sec	0.00E+00	0.00E+00	
C. Particulates				
1. Total release with T½ >8 days	Ci	2.37E-06	1.38E-06	±25
2. Average release rate for period	uCi/sec	3.05E-07	1.75E-07	
3. Gross alpha radioactivity	Ci	<3.28E-07	<2.91E-07	
D. Tritium				
1. Total release	Ci	4.66E-01	1.21E+00	±25
2. Average release rate for period	uCi/sec	5.99E-02	1.53E-01	
E. Percent of Tech Spec Limit Iodines, Particulate with T½ > 8 days, & Tritium				
	%	9.72E-04	2.52E-03	±25

TABLE 1C
 EFFLUENT AND WASTE DISPOSAL SEMIANNUAL REPORT (Jan - Jun 1998)
 GASEOUS EFFLUENTS-GROUND RELEASES

Nuclides Released	Unit	CONTINUOUS MODE		BATCH MODE	
		1st Quarter	2nd Quarter	1st Quarter	2nd Quarter
1) Fission Gases					
Krypton (Kr) 85m	Ci			1.30E-04	8.89E-05
Krypton (Kr) 85	Ci				2.59E-04
Krypton (Kr) 87	Ci				2.73E-08
Krypton (Kr) 88	Ci				2.18E-05
Xenon (Xe) 131m	Ci				
Xenon (Xe) 133m	Ci				4.18E-04
Xenon (Xe) 133	Ci	2.48E-02	1.65E-02	1.45E-02	2.00E-02
Xenon (Xe) 135m	Ci				
Xenon (Xe) 135	Ci	1.81E-03	8.47E-04	3.86E-03	3.31E-03
Xenon (Xe) 138	Ci				
Argon (Ar) 41	Ci	2.19E-02	2.97E-02	1.04E-03	1.52E-04
TOTAL FOR PERIOD	Ci	4.85E-02	4.70E-02	1.96E-02	2.43E-02
2) Iodines					
Iodine (I) 131	Ci				
Iodine (I) 133	Ci				
Iodine (I) 135	Ci				
TOTAL FOR PERIOD	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

TABLE 1C
EFFLUENT AND WASTE DISPOSAL SEMIANNUAL REPORT (Jan - Jun 1998)
GASEOUS EFFLUENTS - GROUND RELEASES

Nuclides Released	Unit	CONTINUOUS MODE		BATCH MODE	
		1st Quarter	2nd Quarter	1st Quarter	2nd Quarter
3) Particulates					
Antimony (Sb) 125	Ci				
Barium (Ba) 133	Ci				
Cadmium (Cd) 109	Ci				
Cerium (Ce) 139	Ci				
Cerium (Ce) 141	Ci				
Cerium (Ce) 144	Ci				
Cesium (Cs) 134	Ci				
Cesium (Cs) 137	Ci	5.10E-07	1.38E-06		
Cobalt (Co) 57	Ci				
Cobalt (Co) 58	Ci				
Cobalt (Co) 60	Ci				
Chromium (Cr) 51	Ci				
Niobium (Nb) 95	Ci	1.07E-06			
Strontium (Sr) 89	Ci				
Strontium (Sr) 90	Ci				
Tin (Sn) 113	Ci				
Zirconium (Zr) 95	Ci	7.91E-07			
TOTAL	Ci	2.37E-06	1.38E-06	0.00E+00	0.00E+00

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C. LIQUID EFFLUENTS

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TABLE 2A
EFFLUENT AND WASTE DISPOSAL SEMIANNUAL REPORT (Jan - Jun 1998)
LIQUID EFFLUENTS - SUMMATION OF ALL RELEASES

	UNITS	QUARTER 1st	QUARTER 2nd	EST. TOTAL ERROR %
A. Fission and activation products				
1. Total release (not including tritium, gases, alpha)	Ci	2.31E-02	2.69E-02	±25
2. Average diluted concentration during period	uCi/ml	1.55E-10	1.22E-10	
B. Tritium				
1. Total release	Ci	2.67E+01	1.63E+02	±25
2. Average diluted concentration during period	uCi/ml	1.79E-07	7.42E-07	
C. Dissolved and entrained gases				
1. Total release	Ci	1.71E-05	6.60E-04	±25
2. Average diluted concentration during period	uCi/ml	1.15E-13	3.00E-12	
D. Gross alpha radioactivity				
1. Total release	Ci	< 2.29E-05	< 5.41E-05	±25
E. Volume of waste released (prior to dilution)				
	liters	3.15E+05	6.23E+05	±10
F. Volume of dilution water used during period				
	liters	1.49E+11	2.20E+11	±10
G. Percent of liquid effluent limit				
	%	5.74E-02	3.34E-02	±25

TABLE 2B
LIQUID EFFLUENT AND WASTE DISPOSAL SEMI-ANNUAL REPORT (Jan - Jun 1998)

Nuclides Released	Unit	CONTINUOUS MODE		BATCH MODE	
		1st Quarter	2nd Quarter	1st Quarter	2nd Quarter
Beryllium (Be) 7	Ci				7.55E-05
Manganese (Mn) 54	Ci			1.88E-04	4.75E-04
Iron (Fe) 55	Ci			1.15E-02	1.47E-02
Cobalt (Co) 58	Ci			1.46E-03	8.02E-04
Cobalt (Co) 60	Ci			3.16E-03	7.03E-03
Nickel (Ni) 63	Ci			1.66E-03	1.40E-03
Zinc (Zn) 65	Ci			2.17E-05	
Silver (Ag) 110m	Ci			9.04E-05	
Tin (Sn) 113	Ci			5.45E-06	
Antimony (Sb) 124	Ci				1.09E-05
Antimony (Sb) 125	Ci			1.35E-03	1.26E-03
Cesium (Cs) 134	Ci			1.17E-03	3.11E-04
Cesium (Cs) 137	Ci			2.43E-03	8.31E-04
TOTAL FOR PERIOD	Ci	0.00E+00	0.00E+00	2.31E-02	2.69E-02

Nuclides	Unit	CONTINUOUS MODE		BATCH MODE	
		1st Quarter	2nd Quarter	1st Quarter	2nd Quarter
Xenon (Xe) 133	Ci			1.71E-05	6.60E-04
TOTAL DISSOLVED AND ENTRAINED GASES	Ci			1.71E-05	6.60E-04

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D. SOLID WASTE
FIRST AND SECOND QUARTERS, 1998

TABLE 3
EFFLUENT AND WASTE DISPOSAL SEMIANNUAL REPORT January 1 - June 30, 1998
SOLID WASTE SHIPMENTS

A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (Not irradiated fuel)

1. Type of Waste	Unit	6 Month Period			Est. Total Error, %
		Class A	Class B	Class C	
a. Spent resins, filter sludges, etc.	m ³	4.48E+00	8.24E+00	4.48E+00	
	Ci	7.36E+00	1.73E+02	8.21E+00	±25
b. Dry compressible, contam. equipment for burial	m ³	0	0	0	
	Ci	0	0	0	±25
c. Irradiated Components	m ³	0	0	0	
	Ci	0	0	0	±25
d. Other: Dry compressible, contaminated equip. for volume reduction at offsite facility	m ³	8.64E+01	0	0	
	Ci	7.94E-02	0	0	±25

2. Estimate of major nuclide composition (by type of waste)

NUCLIDE	UNIT	/-----Resin/Filters-----\			CLASS A	Dry Vol Reduction
		CLASS A	CLASS B	CLASS C		
H-3	%	0.0181	0.0127	3.0089	0.6102	
C-14	%	1.5583	0.0799	1.4054		
Cr-51	%	0.0325				
Mn-54	%	1.2488	2.3973	0.4796	0.9510	
Fe-55	%	9.8107	5.3517	47.9111	28.7305	
Co-57	%	0.0218	0.1063			
Co-58	%	2.2393	4.0074	0.0076	5.4492	
Fe-59	%	0.0138				
Ni-59	%	0.0438	0.2734	0.1331		
Co-60	%	6.1826	16.3268	29.1924	25.5536	
Ni-63	%	6.1554	25.8282	12.9825	19.5880	
Zn-65	%	0.0380				
Sr-89	%	0.0001				
Sr-90	%	0.0061	0.1029	0.0058	0.0328	
Nb-95	%	0.0841			1.1170	
Zr-95	%	0.2273			0.8749	
Ru-106	%		0.4924			
Ag-110m	%			0.0220		
Sn-113	%	0.0213	0.0107			
Sb-124	%	0.1155		0.0236		
Sb-125	%	1.7061	0.5808	0.9840	1.3809	
Cs-134	%	24.187	15.1189	0.7904	2.3522	
Cs-137	%	46.212	29.2843	2.6983	12.2249	
Ce-144	%	0.0137	0.0025	0.0244	1.1231	
Hg-203	%		0.0054			
Pu-238	%	0.0019	0.0006	0.0083	0.0025	
Pu-239/240	%	0.0005		0.0021	0.0009	
Pu-241	%	0.0555	0.0172	0.3031		
Am-241	%	0.0009	0.0001	0.0033	0.0014	
Cm-242	%	0.0014	0.0001	0.0003	0.0036	
Cm-243/244	%	0.0035	0.0003	0.0136	0.0033	

Percentages of nuclides and total activities are based on a combination of direct measurements and scaling for non-gamma emitting nuclides.

3. Solid Waste Disposition

# of Shipments	Mode of Transport	Destination
4	Truck	CNS, Barnwell, SC direct burial
1	Truck	F.W.Hake, Memphis, TN volume reduction
1	Truck	S.E.G. Oak Ridge, TN volume reduction

4. Containers Shipped

Container	Number	Class A		Class B		Class C	
		Solid Media	Number	Solid Media	Number	Solid Media	
For Burial:							
Poly HIC	1	N/A	2	N/A	1	N/A	
Drums	0	N/A	0	N/A	0	N/A	
Steel Liner	0	N/A	0	N/A	0	N/A	
Crates	0	N/A	0	N/A	0	N/A	
Volume Reduction:							
Sea Land Cont.	2	N/A	0	N/A	0	N/A	
Crate	5	N/A	0	N/A	0	N/A	
Six Pack	0	N/A	0	N/A	0	N/A	
Drums	0	N/A	0	N/A	0	N/A	

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E. RADIOLOGICAL IMPACT ON MAN

(not required to be submitted with this report)

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F. METEOROLOGICAL DATA

(not required to be submitted in this report)

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G. OFFSITE DOSE CALCULATION MANUAL,
PROCESS CONTROL PROGRAM, OR LAND USE CENSUS LOCATION CHANGES

FIRST AND SECOND QUARTERS, 1998

The ODCM was not changed during this reporting period.

No new locations for dose calculations and/or environmental monitoring were identified by the land use census.

The Process Control Program was upgraded during this reporting period. See the attached justification package and enclosed copy of Revision 4 of the Process Control Program.

Process Control Program

Changes incorporated into Revision 4, effective February 27, 1998

This report summarizes the changes incorporated into Revision 4 of the Solid Radioactive Waste Process Control program (PCP). Each change is listed with a justification for the change and it's impact on the process control program. When the impact is described as "None" , the change has no impact on the Process Control Program or other regulatory compliance requirements.

1. a. Description
Deleted wording in Section 1 stating that the PCP provides instructional guidance.
- b. Justification
Subordinate procedures provide instructions for compliance with the PCP.
- c. Impact
None.
2. a. Description
Revised the purpose and the scope (section 1 and 2) to specify that the PCP applies to processing wet radioactive waste as opposed to the old wording, which stated processing "radioactive waste".
- b. Justification
This revision is to maintain the scope of the PCP as originally intended.
- c. Impact
None.
3. a. Description
Deleted the following sentences from section 1. referring to the Barnwell, South Carolina Low Level Radioactive Waste (LLRW) disposal facility. "Currently, the New York State generators of LLRW do not have access to that facility. This document shall be reviewed for applicability prior to the next LLRW disposal shipment."
- b. Justification
Access to the Barnwell, South Carolina Low Level Radioactive Waste (LLRW) disposal facility has been opened to IP3 and the PCP has been reviewed for compliance with their license.
- c. Impact
None.

4. a. Description
Deleted LWP Activated Charcoal, Anion Resin, Cation Resin, and D-70 media from the list of waste streams generated at IP3. Added Liquid Waste Processing Media to the list of waste streams generated at IP3. (section 2.1)
- b. Justification
The intent of this section is to list general categories of existing waste streams rather than specific waste streams.
- c. Impact
None.
5. a. Description
Added Contaminated oil and Contaminated soil to the list of waste streams generated at IP3. (section 2.1)
- b. Justification
These waste streams are not adequately covered by previously listed waste streams.
- c. Impact
None.
6. a. Description
Deleted the specific reference to SEG in section 2.2 and revised section to refer to offsite vendors in general.
- b. Justification
Revision made for clarity.
- c. Impact
None.
7. a. Description
Deleted plant and vender procedures from the references section (section 3) and deleted references throughout the PCP to the portions of section 3 that were removed.
- b. Justification
These procedures were not used in the development of the PCP.
- c. Impact
None.
8. a. Description
Deleted reference 3.3.3 Richland (Washington) disposal site license from the references section.
- b. Justification
IP3 does not ship to the Richland (Washington) disposal site.
- c. Impact
None.

9. a. Description
The Waste Management Processing and Transportation Supervisor is now described as Waste Management Supervisor responsible for Processing and Transportation throughout the PCP.
- b. Justification
This revision reflects a change in job title.
- c. Impact
None.
10. a. Description
Revised the definition of Significant Quantity in section 5 to read "Greater than or equal to 1 percent of the class A concentration limits as determined by 10 CFR Part 61.55 Table 1 for class A waste." and "Greater than or equal to 1 percent of the class C concentration limits as determined by 10 CFR Part 61.55 Table 1 for class C waste."
- b. Justification
This is consistent with the NRC Branch Technical Position on Radioactive Waste Classification.
- c. Impact
None.
11. a. Description
Revised the definition for cyclic training in section 6.3 from two years to three years.
- b. Justification
This is in keeping with current regulatory requirements.
- c. Impact
None.
12. a. Description
Revised requirement for dewatering liquid waste in section 9.1.1 to read "All wet waste being shipped directly for burial is dewatered to less than 1 percent by volume prior to shipment." and "Wet waste being shipped directly for burial in a container other than a HIC is dewatered to less than .5 percent by volume prior to shipment."
- b. Justification
This requirement comes from regulations in 10 CFR 61 pertaining to disposal of waste. This is not required for shipments to volume reduction facilities.
- c. Impact
None.

13. a. Description
Revised section 9.1.3 to read "When using HICs as a disposal package at the Barnwell disposal site, a DHEC approved concrete overpack structure is used to provide the enhanced structural stability that meets the requirements of 10 CFR Part 61.56 and the State of South Carolina."
- b. Justification
This is consistent with the current requirements at the Barnwell disposal site.
- c. Impact
None.
14. a. Description
Revised wording in section 9.4.2 to read more consistently with 10 CFR 20 APP F.
- b. Justification
This revision is to more accurately reflect the requirements of the regulations.
- c. Impact
None.
15. a. Description
Deleted the corporate Radiation Protection Staff from the list of organizations performing QC audits (section 9.4.2).
- b. Justification
This revision reflects a change in NYPA corporate structure. Audits are performed by the Radiation Protection Department, Quality Assurance Department, and qualified vendors.
- c. Impact
None.
16. a. Description
Deleted the reference to Quality Assurance Instruction (QAI) 1.3 in section 9.4.2.
- b. Justification
This document has been voided. Deleting QAI 1.3 was in accordance with QA procedures and polices. The QA program is still administered in accordance with the requirements of 10 CFR 50 Appendix B.
- c. Impact
None.

17. a. Description
Deleted requirements to fill HICs to 85% of capacity from section 9.6.
- b. Justification
Concrete overpack structures are used to provide the enhanced structural stability that meets the requirements of 10 CFR Part 61.56 and the State of South Carolina.
- c. Impact
None.
18. a. Description
Revised section 9.6 to reflect use of the uniform shipping manifest.
- b. Justification
This revision reflects the required use of the uniform shipping manifest (per 49 CFR and 10 CFR 71).
- c. Impact
None.
19. a. Description
Deleted the attachments section which included the following attachments:
- Block diagram of the typical vendor-supplied waste processing system.
- Block diagram of a typical vendor's heat-enhanced dewatering system (HED). May be used on HICS and liners with dewatering internals installed.
- Block diagram, generic dewatering system.
- b. Justification
These attachments provide no additional value to the PCP and are found in lower tier documents.
- c. Impact
None.
20. a. Description
Added requirement for all waste received at the Barnwell facility in polyethylene HICs, to be disposed within approved disposal overpacks.
- b. Justification
This is consistent with the current requirements at the Barnwell disposal site.
- c. Impact
None.

21. a. Description
Revised wording in paragraph 9.2.2 d, referring to conditions requiring an increased sampling frequency. The paragraph now reads as follows: "Sustained, unexplained changes in the routinely monitored Alpha\Beta ratios, as determined by Radiological Engineering."
- b. Justification
The requirement remains the same. The wording change is for clarity.
- c. Impact
None.
22. a. Description
Added Code of Federal Regulations, Title 10, Part 71 to the references section.
- b. Justification
These regulations are referenced by IP3's Radiological and Environmental Technical Specifications.
- c. Impact
None.
23. a. Description
Added definitions for Reportable Quantity and Certificate of Compliance to section 5.1.
- b. Justification
This change is to improve clarity.
- c. Impact
None.
24. a. Description
Revised section 9.6 to distinguish between Class A stable and Class A unstable.
- b. Justification
This change is to improve clarity.
- c. Impact
None.
25. a. Description
Revised limitation stating that only qualified personnel may characterize or package radioactive waste to specify that this limitation is for waste being packaged for transportation or disposal.
- b. Justification
This change is to clarify the intent of the limitation and more clearly define the requirements of the pertinent regulations.
- c. Impact
None.

26. a. Description
Revised section 9.1 to specify that the 1% limit on free standing liquids in a burial container applies to HICs. All other containers have a .5 percent limit on free standing liquids.
- b. Justification
This revision is to more clearly reflect the requirements of the regulations and the burial site.
- c. Impact
This change will better ensure compliance with regulatory requirements.
27. a. Description
Deleted references to RE-RWM-12-3, Waste Classification Compliance program and used the more generic term of approved plant procedures.
- b. Justification
This change was initiated prior to supplementing RE-RWM-12-3 with several new procedures to more concisely define requirements for waste stream sampling and maintaining databases associated with shipping software.
- c. Impact
This change will better ensure regulatory compliance.