CENTRAL FUES

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Consolidated Edison Company of New York, Inc. 4 Irving Place, New York, N Y 10003 Telephone (212) 460-3819

September 24, 1979

Re: Indian Point Unit Nos. 182 Docket Nos. 50-3, 50-247

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

Dear Mr. Grier:

In response to your letter dated August 10, 1979 forwarding IE Bulletin No. 79-19, the following information is being supplied:

- 1. A set of current DOT and NRC regulations concerning the transfer, packaging and transport of low-level radioactive waste material is being maintained.
- 2. The current license requirements placed on the waste burial firm contracted by Con Edison is being maintained.
- 3. The responsibilities for safe transfer, packaging and transport of low-level radioactive material are delineated in writing in various documents. These documents are presently being reviewed to provide more specific responsibilities. This effort is expected to be completed by January 1, 1980.
- 4. Administrative controls and corresponding implementation procedures are in the process of being revised. This effort is scheduled for completion by March 1, 1980.
- 5. A program for training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements, and instructions and operating procedures for all personnel involved in the transfer, packaging and transport of radioactive material will be implemented by March 1, 1980. A record of training dates, attendees and subject material will be maintained.
- 6. A program to provide training and periodic retraining will be implemented by March 1, 1980 on a need to know basis to employees 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.

- 7. Con Edison has an established management controlled audit program which includes the auditing of activities associated with the transfer, packaging and transport of low-level radioactive waste to provide assurance that personnel, instructions and procedures, and process and transport equipment are functioning to ensure safety and compliance with regulatory requirements.
- 8. A management-controlled audit of activities associated with the transfer, packaging and transport of low-level radioactive waste will be performed by October 9, 1979.
- 9. Items 1 and 2. This information is reported in accordance with the Technical Specifications for the facility.

Item 3.

Urea Formaldehyde is used to solidify the liquid low-level waste generated at the facility.

Very truly yours,

William J. Cahill, Jr. Vice President

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

> Mr. T. Rebelowski, Resident Inspector U. S. Nuclear Regulatory Commission P. O. Box 38 Buchanan, N. Y. 10511