

OBryan, Phil

From: Kuzo, George *RG*
Sent: Thursday, February 11, 2010 7:11 AM
To: Bonser, Brian
Cc: Gepford, Heather; Musser, Randy; Conatser, Richard; Hamilton, Ruben; Nielsen, Adam; OBryan, Phil
Subject: BSEP RP Status

To date, there are no significant issues identified during the BSEP RP inspection. Current items the group is reviewing, include the adequacy of calibrations for two ARMs (awaiting cal data for ARM/rad monitor issues) and also on-site storage of liquid waste.

Regarding the liquid radwaste storage, up to 25,000 gals of waste in "tote" containers (each a 250 gal container) have been stored onsite. Yes, it is fondly referred to as the "tote farm". Currently there are approximately 65 of the totes awaiting processing. We are reviewing current licensee commitments, 50.59 documents, and RG commitments regarding storage of liq waste to review regulatory connection (nexus) for radwaste. Regardless of regulatory nexus, there will be comment at exit, as this is an extremely poor practice in light of current COM and political focus on systems that could potentially leak to groundwater. There appears to be no 50.59 screenings or reviews, no limits on activities/concentrations stored, no limits on how long this temporary storage will continue (some totes have been used/store in excess of 5 years), no established routine surveillences on material condition of containers, and the waste material continues to be generated awaiting processing through a process skid not described in their FSAR. There have been no leaks to date, but much of the material is stored on a gravel surface which if a leak occurs could result in movement of material to the groundwater and would lead to additional reporting under the Groundwater protection initiative. They have a CR on the issue, and are trying to process the waste, but this is an issue that appears to have started with minimal evaluation, and then ballooned out-of-control until recently.

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