Central file

WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

September 28, 1979

Mr. J. G. Keppler, Regional Director Office of Inspection & Enforcement Region III U. S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137

Dear Mr. Keppler:

Docket 50-305 Operating License DPR-43 IE Bulletin 79-19 - Packaging of Low-Level Radioactive Waste for Transportation and Burial

We have received and reviewed the above referenced bulletin and the following is our response to specific action items of the bulletin.

- Item 1: A current set of DOT and NRC regulations concerning the transfer, packaging and transport of low-level radioactive waste material has been ordered.
- Item 2: We have the current burial requirements from our present burial site at South Carolina and we will obtain requirements with other agreement states prior to shipment to that state's burial site.
- Item 3: The Kewaunee Plant Administrative Control Directive designates responsible personnel.
- Item 4: Our current set of Health Physics procedures includes transfer, packaging and transport of low-level radioactive materials.
- Item 5: The DOT and NRC regulatory requirements are used in the basis for formalization of waste handling procedures. The HP Supervisor is responsible for implementation of these requirements and has had formal training in this area. The training of the waste handling by operators is implicit in the utilization of approved procedures. No formal training in DOT and NRC requirements is necessary.

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- Item 6: The Radiation Waste Operator is a specific job at the Kewaumee Plant. Training of personnel who operate the processes which generate waste is performed on the job. No formal training program is provided. Records of future training in this area will be kept in the individual's training portfolio. It should be noted that radioactive waste process is done under strict administrative control. A review of the volume of waste generated indicates our plant is one of the lowest in the country. Our present practices and training, therefore, is adequate for the performance of this function.
- Item 7: Transfer, packaging and transport activities have been incorporated into the Quality Assurance Audit Program for periodic review.
- Item 8: A Quality Assurance Audit of our activities associated with the transfer, packaging and transport of low-level radioactive waste has been initiated.
- Item 9: The quantity and volume of low level radioactive waste shipped is reported semi-annually in our Semi-Annual Effluent Report. The major isotopes shipped are also part of the report.

The Kewaunee Plant does generate low-level liquid waste. The radioactivity in these wastes are stabilized by ion exchange and the resultant spent resins are solidified in concrete.

Very truly yours,

C W Giesler for

E. R. Mathews, Vice President Power Supply & Engineering

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