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SCHROCK, C.A. Wisconsin Public Service Corp.
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SUBJECT: Suppls 890912 request for authorization for alternate disposal of very low level radioactive matls from facility, per NRC Info Notices 83-005 & 88-022. Requests approval for transfer of slightly contaminated sewage treatment sludge.

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WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

July 15, 1993

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Sewage Treatment Plant Sludge Disposal

- Reference:
- 1) Letter to Document Control Desk from K. H. Evers dated September 12, 1989
 - 2) Letter to K. H. Evers from M. J. Davis dated February 13, 1990
 - 3) Letter to Document Control Desk from C. A. Schrock dated October 17, 1991
 - 4) Letter to C. A. Schrock from A. G. Hansen dated June 17, 1992

In reference 1, pursuant to the regulation of 10CFR 20.302, Wisconsin Public Service Corporation (WPSC) requested authorization for the alternative disposal of very-low-level radioactive materials from the Kewaunee Nuclear Power Plant. This request was made in accordance with the NRC guidance presented in Information Notice 83-05, "Obtaining Approval for Disposal of Very-Low-Level Radioactive Waste"; 10CFR 20.302; and Information Notice 88-22, "Disposal of Sludge From Onsite Sewage Treatment Facilities at Nuclear Power Stations". This request provided a detailed description of the licensed material, thoroughly analyzed and evaluated the information pertinent to the effects on the environment, and committed to follow specific procedures to minimize the risk of unexpected exposures. The licensed material included four waste streams with one of the waste streams being sewage treatment plant sludge. For this specific waste stream, WPSC requested authorization to dispose of the slightly contaminated sludge at a municipal sewage treatment plant.

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In reference 2, the NRC identified additional questions that needed to be addressed in order to complete their review. Several of these questions dealt specifically with the disposal of sewage treatment plant sludge. Reference 3 provided the WPSC response to these additional questions.

Finally, in reference 4, WPSC received approval for the onsite disposal of one of the waste streams (service water lagoon waste sludge). In addition, WPSC was notified that further evaluation of the remaining waste streams would not continue unless specifically requested.

By means of this letter we are requesting the NRC staff to initiate action to continue their review of the 10CFR 20.302 request submitted in reference 1. Specifically, we request your approval for the transfer of slightly contaminated sewage treatment sludge generated at the KNPP to the municipal sewage treatment plant. This method of disposal is similar to the request (from the Duke Power Company) discussed in Information Notice 88-22, which was determined to be acceptable. This request is to address the future generation of very low level contaminated waste, and therefore authorization for future disposal is requested. The dose pathway modeling used in reference 1 for determining the radioactive material concentration limits is based on NRC modeling. The computer code IMPACTS-BRC is used as the basis for calculating the potential doses from the alternate disposal method. This modeling includes reasonable conservative exposure pathway scenarios for the various disposal methods. Please contact my staff if you have any questions or would like to discuss this request.

Sincerely,



for C.A. Schrock
Manager - Nuclear Engineering

DJM

cc - US NRC - Region III
Senior Resident Inspector, US NRC