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STATE OF NEW YORK

JAMES L. LAROCCA

AGENCY BUILDING 2 EMPIRE STATE PLAZA ALBANY, NEW YORK 12223

January 12, 1979

Mr. Donald P. Dise Vice President - Engineering Niagara Mohawk Power Corporation 300 Erie Boulevard West Syracuse, NY 13202

Dear Mr. Dise:

We have reviewed the application from Niagara Mohawk to the NRC and the supporting non-proprietary Newport News Industrial Corporation Topical Report for the proposed Nine Mile Point Unit I Radwaste Volume Reduction System.

The need for low-level waste volume reduction as well as improvements in handling and solidification practices at nuclear facilities is clear. Where such efforts can be demonstrated to be safe, environmentally acceptable and economically justifiable, we encourage their adoption.

Our review of your application to the NRC has identified a number of areas in which there is insufficient information to fully evaluate the impacts of your proposal. Questions resulting from this review and those from other cognizant State agencies are contained in the enclosure.

Please forward a response to this request as expeditiously as possible so that we may complete our évaluation. These questions should also be addressed during the Technical and Public Information meeting on January 30, 1979.

If you or your staff have any questions related to this request, please contact me or Mr. Jay Dunkleberger at (518) 474-2181.

**REGULATORY DOCKET FILE COPY** 

TKD/plc Enclosure

cc: Philip Polk Robert Deyle

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Sincèrely

T.`K. DeBoer Director of Nuclear Operations

- Discuss the waste material pretreatment requirements of the combustible feed sub-system. Describe the methods used to remove waste materials that are not compatible with the sub-system; include in the discussion, separation of welding rods, nuts and bolts, metal gaskets and wire scraps.
- Does this system require mixing of combustible materials to maintain a constant pressure in the incineration vessel? If mixing is a system requirement, explain methods to be utilized. If mixing is not required, explain why.
- 3. What is the ratio of fly ash to bed ash in the incineration mode and the calcining mode?
- 4. What is the basis for assuming that 10% of granular ash in the product container escapes from the Rad Waste building during the maximum credible accident for RWR-1?
  - 5. Discuss the heat removal requirements of the product container that. receives material from the Dry Cyclone; include requirements, if any, for ash cooldown prior to solidification.
  - 6. What is the maximum operational radiation level anticipated for each 55 gallon drum receiving material from the product container? What is the longest anticipated on-site storage time for the solidified RWR-1 ash? What are the anticipated radiation levels for drums of solidified RWR-1 ash prior to off-site disposal?

(The following questions pertain to radwastes similar to the types anticipated for processing in RWR-1)

What is the longest on-site storage time for waste currently processed in existing systems? What are the radiation levels of drums being shipped off-site to disposal facilities?

- 7. Discuss the requirements for fire protection for the waste hopper, shredder system and the off-gas filter system.
- 8. Describe any special precautions necessary to prevent bed damage when removing the process vessel from service.
- 9. Are wastes from adjacent plants planned or contemplated for disposal at RWR-1 facility?
- 10. What effects are anticipated from the chlorine that is generated from the incineration of PVC plastics?
- 11. What type of corrosion monitoring will be utilized to track the deterioration of system components?
- 12. What type of startup program is proposed to check out the individual components and the complete system before the unit is placed in service utilizing contaminated feed?

- 13. Discuss the rationale for installing an interim system utilizing the Dow Chemical process and recommending the cement system as the final long-term solidification system.
- 14. The Topical Report, Section 3.0, states that transformer oil can be processed in RWR-1.. Explain the system's capability to safely incinerate PCB's that may be present in transformer oil.
- 15. Have radioactive tracer studies been performed with the RWR-I system for all isotopes/elements anticipated to be processed? What removal efficiency was observed for each?
- 16. What specification or guideline is used to justify "under 6 rem" as an acceptable accident dose?
- 17. The results of the calculations for the maximum credible accident site boundary doses in the Topical Report and in Niagara Mohawk's analysis differ significantly. Discuss the assumptions used for each case. What factors specific to NMP#1 would contribute to the different results? Justify the use of a breathing rate assumption of 20M<sup>3</sup>/day in comparison to an application of Reg.Guide 1.3, Section C.2c.
- 18. New York State's Department of Environmental Conservation Air Resources section is of the opinion that some of the emissions will fall under the purview of 6NYCRR Part 212. Part 212 requires the assignment of an "A" rating to the emission point. This means that the emission rate potential (or uncontrolled emissions) of any gaseous, liquid, or solid particulate wastes must be controlled by 99 percent or greater. Is RWR-1 capable of meeting this criteria?