CENTRAL FILES

NMP-1152

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

September 21, 1979

Mr. Boyce H. Grier
Director
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19046

RE: Docket No. 50-220
I.E. Bulletin 79-19

Dear Mr. Grier:

Your August 10, 1979 I.E. Bulletin 79-19 addresses packaging of low-level radioacitve waste for transport and burial.

The attachments to this letter are in response to those concerns.

Very truly yours,

Thomas E. Lempges

Thomas E. Lempges
General Superintendent
Nuclear Generation
for
R.R. Schneider
Vice President -
Electric Production

mtm

Attachments

xc: NRC Office of Inspection & Enforcement
Division of Fuel Facility & Materials
Safety Inspection
Washington, D.C. 20555

cc

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RESPONSES TO I.E. BULLETIN 79-19

Item #1

Maintain a current set of DOT and NRC regulations concerning the transfer, packaging, and transport of low-level radioactive waste material.

RESPONSE

Current DOT and NRC regulations are maintained in the station library.

ITEM #2

Maintain a current set of requirements (license) placed on the waste burial firm by the Agreement State of Nevada, South Carolina, or Washington before packaging low-level radioactive waste material for transfer and shipment to the Agreement State licensee. If a waste collection contractor is used, obtain the appropriate requirements from the contractors.

RESPONSE

Copies of the burial license are maintained by the Radwaste Operations Coordinator and the Radiation Protection Department Supervisor.

ITEM #3

Designate, in writing, people in your organization who are responsible for the safe transfer, packaging and transport of low-level radioactive material.

RESPONSE

The Radwaste Operations Coordinator and the Radiochemistry and Radiation Protection Supervisor for Nine Mile Point Unit #1 are responsible for the safe transfer, packaging and transport of low level radioactive material.

The Plant Superintendent or his designee must approve each radioactive shipment by signing the shipping papers.

ITEM #4

Provide management-approved, detailed instructions and operating procedures to all personnel involved in the transfer, packaging and transport of low-level rasdioactive material. Special attention should be given to controls on the chemical and physical form of the low-level radioactive material and on the containment integirty of the packaging.

RESPONSE

A comprehensive set of procedures for waste handling are being developed to cover the transfer, packaging and transport of waste. These procedures will be completed by January 1, 1980.

ITEM #5

Provide training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements, and in your instructions and operating procedures for all personnel involved in the transfer, packaging and transport of radioactive material. Maintain a record of training date, attendees, and subject material for future inspections by NRC personnel.

RESPONSE

The Operating Department currently receives training in the area of Radwaste as part of the Annual NRC License Requalification Program. The scope of this training will be expanded.

The Radiation Protection Department receives on-the-job training in their areas of responsibility. A formal training program will be developed.

The programs for each department will be similar except that the emphasis will be on different portions of the training literature. It is expected that these will be annual classes with additional training as required as equipment, procedural or regulatory changes dictate.

Training records, lesson plans and handouts will be maintained for NRC inspection by the Training Department.

ITEM #6

Provide training and periodic retraining to those employees who operate the processes which generate waste 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.

RESPONSE

A part of the "General Employee Training" will be devoted to the necessity to minimize the amount of waste that is generated. This will also be stressed to contractors working in the plant. As part of their training, the Waste Building Operators will be given training which will include "front end" volume reduction techniques besides the training in the radwaste processing and solidification equipment.

ITEM #7

Establish and implement a management-controlled audit function of all transfer, packaging and transport activities to provide assurance that personnel, instructions and procedures, and process and transport equipment are functioning to ensure safety and compliance with regulatory requirements.

RESPONSE

NMPC Quality Assurance has established and implemented a controlled Audit/Surveillance function of all transfer, packaging and transport activities.

ITEM #8

Perform, within 60 days of the date of this Bulletin, a management controlled audit of your activities associated with the transfer, packaging and transport of low-level radioactive waste. Maintain a record of all audits for future inspections by NRC or DOT inspectors. (Note: If you have an established audit function and have performed such an audit of all activities in Items 1-6 within the past six months, this audit requirement is satisfied.)

RESPONSE

An audit/surveillance has currently been conducted which included activities associated with the transfer, packaging and transport of low level radioactive waste. All NMPC Quality Assurance records are available for review.

ITEM #9

Provide answers for 1978 and for the first six months of 1979 to the following questions:

1. How many low-level radioactive waste shipments did you make? What was the volume of low-level radioactive waste shipped?

   Information provided in accordance with Technical Specifications.

2. What was the quantity (curies) of low-level radioactive waste shipped? What were the major isotopes in the low-level radioactive waste?

   Information provided in accordance with Technical Specifications.

3. Did you generate liquid low-level radioactive waste? If the answer is 'yes', what process was used to solidify the liquid waste?

   Liquid low-level radioactive waste was solidified by Chem-Nuclear Systems Incorporated, Urea-Formaldehyde System.