Central file

INDIANA & MICHIGAN POWER COMPANY

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NEW YORK, N. Y. 10004

October 11, 1979
AEP:NRC:00267

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE Bulletin 79-19

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region III
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter responds to your letter of August 10, 1979 which we received on August 15, 1979 and which transmitted to us IE Bulletin No. 79-19, concerning packaging of low level radioactive waste for transport and burial.

The attachment to this letter contains the responses to all the items, Nos. 1 through 9, contained in the Bulletin.

Very truly yours,

John E. Dolan

John E. Dolan
Vice President

JED/emc
Attachment

cc: R. C. Callen
G. Charnoff
R. S. Hunter
R. W. Jurgensen
D. V. Shaller
Office of Inspection and Enforcement - NRC Washington

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ATTACHMENT TO
AEP:NRC: 00267

Response To IE Bulletin No. 79 - 19

Response To Item 1: The Plant has complete current copies of 10 CFR and 49 CFR and, in addition, has subscribed to Datamation Inc. Services to furnish the Plant with bi-weekly news-letters which update both 10 CFR and 49 CFR, thereby keeping these documents current.

Response To Item 2: At present the Plant uses a waste collection contractor who is currently shipping waste exclusively to the agreement state of South Carolina. The Plant has copies of the contractor's regulations; state of Maryland radioactive materials license MD-27-001-02 issued to Hittman Nuclear & Development Corporation including amendments 01 and 02; State of South Carolina radioactive material license No. 097 ammendment No. 22 which ammends the license in its entirety, and covers the operation of the Barnwell burial site. If the plant begins shipment to the agreement statesof Nevada or Washington, copies or their licenses will be obtained and reviewed prior to shipment.

Response To Item 3: Procedures which address packaging and which reference the DOT and NRC regulations are a part of the Operations and the Technical Department procedures, and those procedures which address the regulations governing the shipping of low-level radioactive material are a part of the Technical Department procedures.

Although several plant departments are involved in following these procedures to insure the proper transfer, packaging and transport of low-level radioactive waste, each supervisor has the responsibility to see that the procedures are followed. The Plant Radiation Protection Supervisor has the ultimate responsibility to see that the DOT and NRC regulations are met prior to releasing low-level radioactive materials for transport and/or burial.

Response To Item 4: The Technical Specifications, Section 6.8. 1. a, require that written procedures shall be established, implemented and maintained covering the activities recommended in "Appendix A" of Regulatory Guide 1.33, November, 1972. In accordance with this requirement, management approved procedures, including all appropriate regulatory requirements references, which address the processing, packaging, storage, and shipment of low-level radioactive waste material have been established, implemented and updated. These procedures are documented and kept in plant master file and in the various departments to which they apply. They are available to the personnel who are required to bail waste, transfer resin, evaporate liquid waste, change and transfer filters, and ship low-level radioactive waste. The evaporator operating procedures require sampling and analysis of the concentrates during operation to insure that the proper chemistry is maintained.

In addition to the present procedures, a Process Control Program (PCP) is being developed which will address the waste chemical and physical form and solidification. This PCP will be a requirement of the Radiological Effluent Technical Specifications, NUREG-0472, which has been under the review of the licensing branch of the NRC.

Response To Item 5: Routine monthly training sessions are held by each Technical Department Section. As part of the training of the members of the Radiation Protection and the Environmental Sections who are responsible for the transfer, packaging and transport of radioactive waste, a session is held on the pertinent responsibilities. The plant procedures which reference and/or repeat the DOT and NRC regulatory requirements are discussed. These training sessions are documented by maintaining a record of the training dates, attendees, and subject material which is kept in the department files. The above training will be evaluated for completeness as it pertains to this bulletin.

Response To Item 6: The reactor operators training and retraining program includes system training in the chemical volume and control system letdown, charging and the waste disposal system. During this training it is explained to the operators that liquid waste generation requires processing before ultimate discharge and/or burial. Although solidification is currently being performed by an outside contractor, a description of the chemical and physical forms of the processed waste are part of operator training.

In addition to the above, each individual who enters the Plant and who may be required to wear anti-contamination clothing receives a training session on this clothing. The session includes training in clothing conservation and how it affects laundry waste and drummed waste if disposable clothing is used.

Response To Item 7: An interim plant management-controlled audit of transfer, packaging and transport activities was performed on September 25 and 26, 1979 to insure the adequacy of the personnel instructions and procedures, and the process and transport equipment with respect to safety and compliance with regulatory requirements. Some of the audit findings identified action items currently in process; some as a result of previous NRC commitments. Consequently, the establishment and implementation of a properly management-controlled audit function as required in item No. 7 of this bulletin is being deferred until January, 1980 to allow full implementation of all commitments involved.

Response To Item 8: An audit function of transfer, packaging and transport activities of low-level radioactive waste from the Donald C. Cook Nuclear Plant has been established under the cognisance of the Nuclear Safety and Design Review Committee. The first audit has been conducted on October 3 and 4, 1979. Subsequent audits will be conducted periodically. Copies of the audits' results will be filed in the Plant Q/A Department.

Response To Item 9:

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

Response: The information required by this question is contained in the Semi-Annual Effluent Release Reports which have been submitted as required by the 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?

Response: The information required by this question is contained in the Semi-Annual Effluent Release Reports which have been submitted as required by the 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?

Response: Yes, all liquid low-level radioactive waste was solidified with Urea Formaldehyde.