September 27, 1979

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 670
PO/RMT:scl
Docket Nos. 50-280
50-281
50-338
License Nos. DPR-32
DPR-37
NPF-4

Subject: IE Bulletin 79-19

Dear Mr. O'Reilly:

This is in response to IE Bulletin No. 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial". Our responses for Surry Power Station Unit Nos. 1 and 2 and North Anna Power Station Unit No. 1 are attached. We acknowledge that the response for North Anna Power Station is incomplete at this time and intend to forward the remaining information on or about October 31, 1979.

Very truly yours,

W. C. Spencer

for

C. M. Stallings
Vice President-Power Supply
and Production Operations

Attachment

cc: Director, Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission, Washington, D. C. 20555

Director, Division of Fuel Facility and Materials
Safety Inspection
U. S. Nuclear Regulatory Commission, Washington, D. C. 20555

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Response to IE Bulletin 79-19
Surry Power Station Unit
Nos. 1 and 2

Items are numbered as in the Bulletin

NRC 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 copies of the DOT and NRC regulations concerning the transfer, packaging, and transport of low-level radioactive waste are available at the station.

NRC 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 waste collection contractor is used, obtain the appropriate requirements from the contractor.

RESPONSE A current copy of the radioactive material receipt license for Chem-Nuclear burial facility in Barnwell, S. C. is maintained on file in the Health Physics office.

NRC 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 At this time, the individuals primarily responsible for the safe transfer, packaging, and transport of low level radioactive waste are designated in writing by means of station memorandum.

NRC ITEM 4. Provide management-approved, detailed instructions and operating procedures to all personnel involved in the transfer, packaging and transport of low-level radioactive material. Special attention should be given to controls on the chemical and physical form of the low-level radioactive material and on the containment integrity of the packaging.

RESPONSE A thorough procedure has been established and approved by management for the transfer, packaging, and transport of low-level radioactive waste. This procedure is readily available to all personnel involved with radioactive waste.

NRC ITEM 5. Provide training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial 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 dates, attendees, and subject material for future inspections by NRC personnel.

RESPONSE Individuals are trained in the DOT and NRC regulatory requirements, the waste burial license requirements, and the procedures for transfer, packaging, and transport of radioactive material through an extensive step training program administered by the Training Department. All records of training dates, attendees, and subject matter are on file at the Training Center.

NRC 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 Training to personnel who operate the processes which generate radioactive waste is also conducted by the Training Department and all records are on file at the Training Center.

NRC 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.

RESONSE Vepco Quality Control will audit all activities listed in items 1 through 6 of this bulletin during their annual audit of the Health and Physics and Radiological Controls Program. In addition, they will continue to randomly inspect packaging of low-level radioactive waste shipments.

NRC 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 6-6 within the past six months, this audit requirement is satisfied.)

RESPONSE An audit of all activities listed in items 1 through 6 of this bulletin will be performed prior to October 9, 1979.

NRC ITEM 9. Report, in writing, within 45 days, your plan of action and schedule with regard to the above items. In addition, provide responses to the three questions below. Reports should be submitted to the Director of the appropriate NRC Regional Office and a copy should be forwarded to the NRC Office of Inspection and Enforcement, Division of Fuel Facility and Materials Safety Inspection, Washington, D.C. 20555.

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?

   (Power reactor licensees who report this information in accordance with Technical Specifications do not need to respond to this question.)

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

   (Power reactor licensees who report this information in accordance with Technical Specifications do not need to respond to this question.)

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

RESPONSE (1) The number and volume of low level radioactive waste shipments is reported in the annual station effluent report.

(2) The quantity of low-level radioactive waste shipped is also reported in the annual station effluent report.

(3) Occasionally, small quantities of low-level radioactive liquid waste are generated and solidified with concrete in 55-gallon drums.

Response to IE Bulletin 79-19
North Anna Power Station
Unit No. 1

1. Currently on file is a copy of NRC Regulations contained in the Nuclear Regulations Reporter. While this is not a legal document, it is updated almost every week. We also have a copy of DOT Regulations as contained in Title 49. The latest revision to this document has been requested.

2. We have a copy of Chem-Nuclear's Agreement State license number 097 with amendments up to 25. Also on file is a copy of Chem-Nuclear's NRC License number 46-13536-01 with amendments up to number 11.

3. An administrative procedure will be written to designate the personnel responsible for the safe transfer, packaging and transport of low-level radioactive material.

4. Health Physics procedures and Operating procedures provide approved, detailed instructions to all personnel involved with the transfer, packaging and transport of low level radioactive material.

5. The Operations and Health Physics Departments provide a development program for their personnel to train them in their job responsibilities. Operators also undergo extensive retraining and requalification on a periodic bases. These programs will be expanded to include the required material not presently covered in the training.

6. The Operations development program and retraining and requalification program both provide the necessary training required for personnel who operate the processes which generate waste.

7. Vepco Quality Control will audit all activities listed in items 1 through 6 of this bulletin during their annual audit of the Health Physics and Radiological Controls Program. In addition, they will continue to randomly inspect packaging of low-level radioactive waste shipments.

8. An audit of all activities listed in items 1 through 6 of this bulletin will be performed prior to October 9, 1979.

9. A schedule for the implementation of the above items will be submitted by October 31, 1979.

For 1978 and the first six months of 1979

1. The number and volume of low-level radioactive waste shipments are contained in the semi-annual reports and the Annual Effluent Report.

2. The quantity (curies) of low-level radioactive waste shipments and their major isotopes can also be found in the semi-annual reports and the Annual Effluent Report.

3. The liquid waste is processed by demineralization. The demineralizers, when spent, are dewatered and shipped for burial.