



**Consumers
Power
Company**

COPY

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September 25, 1979

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Office of Inspection and Enforcement
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT AND
DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT IE BULLETIN NO 79-19,
PACKAGING OF LOW-LEVEL RADIOACTIVE WASTE FOR
TRANSPORT AND BURIAL

Consumers Power Company's response to IE Bulletin 79-19 (Packaging of Low-Level Radioactive Waste for Transport and Burial) covering Palisades and Big Rock Point Nuclear Plants is as follows:

Item #1

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

Response

Palisades: Currently comply.

Big Rock Point: NRC regulations maintained. DOT regulations will be maintained by November 30, 1979.

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

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the Agreement State licensee. If a waste collection contractor is used, obtain the appropriate requirements from the contractor.

Response

Palisades: Currently comply.

Big Rock Point: Currently comply.

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

Palisades: Designated in Plant Administrative Procedures.

Big Rock Point: Designated in Plant Administrative Procedures.

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

Palisades: Procedures HP-2.44, "Low-Level Waste Packaging" and HP-6.20, "Radioactive Waste Shipment" exist and are on file in Region III.

Big Rock Point: Health Physics and Operating Procedures exist and are Plant Review Committee (PRC) approved.

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 dates, attendees, and subject material for future inspections by NRC personnel.

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Response

Palisades: Training covering Procedure HP-2.44 mentioned above will be completed by January 15, 1980. All other topics are covered in technical training that are repeated periodically.

Records are maintained according to Plant Procedures for future inspection by NRC personnel.

Big Rock Point: A two-day training seminar for responsible plant staff members will be conducted during November 1979. A retraining program will be established subsequent to the seminar and will be formalized by February 1, 1980.

Records are maintained according to Plant Procedures for future inspection by NRC personnel.

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

Palisades: Fifth-shift training is used to cover operators. Also, by January 15, 1980 repairmen will be included to cover items in Item 6. General employee retraining is done every two years.

Big Rock Point: Volume 18 of Plant Procedures provides for training and retraining of employees that operate processes that generate waste. On-the-job training is provided in the Operating Procedures to these employees to minimize the generation of waste.

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

Palisades & Big Rock Point: Changes to General Office procedures covering these items (audits) have been implemented.

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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

Palisades & Big Rock Point: Audits have been completed and are on file.

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 his 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?

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Response

Palisades: Question 1, Reported in accordance with Technical Specifications.

 Question 2, Reported in accordance with Technical Specifications.

 Question 3, Yes, liquid waste is solidified using the urea formaldehyde (UF) process.

Big Rock Point: Question 1, Reported in accordance with Technical Specifications.

 Question 2, Reported in accordance with Technical Specifications.

 Question 3, Do not generate liquid low-level radioactive waste.

David A Bixel (Signed)

David A Bixel
Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement

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