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August 29, 1979

Dr. James G. Keppler, Director  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

re: Ltr. 8-10-79, J.G.F.  
IE Bulletin No. 79-19  
and  
NRC Licence No. 21-03336-08

Dear Dr. Keppler:

In accord with action by licensees as cited in IE Bulletin No. 79-19, the following information is submitted on each corresponding item page 2 of 3 of the bulletin:

1. The Radiation Safety Committee receives NRC Regulatory changes from the Federal Register, and has updated our records through Supplement #11, that includes 49 CFR Parts 170-179, 10 CFR Parts 19 to 71, and 10 CFR Part 150.
2. Western Michigan University contracts with Nuclear Engineering Company, Inc. of Sheffield, Illinois, for transfer and shipment of low-level radioactive wastes. We utilize the "Summary of Federal Regulations for Packaging and Transportation of Radioactive Materials" by Conlon and Pettigrew, suggested by the contracting agent. This document contains DOT standards under applicable Federal Regulations.
3. Those persons designated as responsible for packaging, transport and transfer of low-level radioactive material under our license are as follows:  

Mr. Robert Wirbel, Safety Officer, Department of Public Safety  
Mr. Lynn Perry, Occupational Safety Officer, Department of Public Safety  
Dr. Imy V. Holt, Director of Radiation Safety
4. A Radiation Control Manual for Western Michigan University has been developed by the Radiation Safety Committee and is in current use. (See Enclosure #1, page 18, "Shipments;" page 19, "Waste Disposal;" page 22, "Isotope Record.")
5. Training for Custodial and Radiation Safety Officers is detailed in the WMU Radiation Control Manual under Appendix VIII, p. 37.

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- 6 Training programs and responsibilities are delineated in Appendix VIII, p. 38, of the WMU Radiation Control Manual enclosed.
7. A management-controlled audit function of all packaging and transfer of low-level radioactive waste is in effect at Western Michigan University. (See Enclosures #2 and #3 of records, inventories of isotopes and shipment records.)
8. The last management-controlled audit was completed and filed in May, 1979. Refer to records in 7 above.
9. Report for 1978 and for the first six months of 1979.

(1) Two low-level radioactive transfer and shipments were made on the following dates:

May 30, 1978 -- (See WMU Material Return Slip and Shipping Permit #84755, the Radioactive Shipment and Disposal Record, Nuclear Engineering Company, Inc. #35309, and Materials Transfer Form #3642 attached as Enclosure #2.

May 31, 1979 -- (See WMU Material Return Slip and Shipping Permit #83002, the Radioactive Shipment and Disposal Record, Nuclear Engineering Company, Inc. #26116, and Materials Transfer Form #1672 attached as Enclosure #2.

(2) Quantities of low-level wastes shipped were as follows:

<u>Date</u>	<u>Level in millicuries</u>
May 30, 1978	22.475
May 31, 1979	112.261

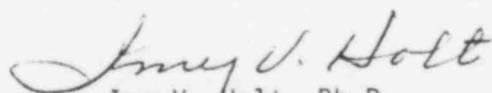
(3) Generated liquid low-level radioactive waste.

All liquid wastes generated are of liquid scintillation types, in toluene and water. Isotopes used in this type sample preparation are <sup>3</sup>H- and <sup>14</sup>C-labeled compounds, <sup>125</sup>I, <sup>22</sup>N, <sup>45</sup>Ca, <sup>137</sup>Cs, and <sup>60</sup>Co uptake in biomass.

These radioactive wastes are either packaged in 55-gallon DOT steel drums with absorbent for disposable scintillation vials or as liquid waste in 30/55-gallon DOT steel drums, supplied by the transfer and shipping contractor, the Nuclear Engineering Company, Inc., Sheffield, Illinois.

We hope that our procedures are well thought out and comply with all regulations and guidelines pertaining thereto. If, after reviewing them, you find we need any improvement, I would appreciate your advice.

Sincerely yours,



Amy V. Holt, Ph.D.  
Director of Radiation Safety

3 Encs.

*See Bulletin file*

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cc NRC Office of Inspection and Enforcement  
Division of Fuel Facility and Materials Safety Inspection  
Washington, D.C.

Mr. Robert Wetnight, Vice-President for Finance

Mr. Robert Wirbel, Safety Coordinator, Radiation Safety Committee

Dr. A. Bruce Clarke, Dean, College of Arts and Sciences

List of Enclosures

<u>No.</u>	<u>Title</u>
1	Radiation Control Manual (W.M.U. 1979).
2	Low-level Waste Records for 1978, 1979.
3	W.M.U. Departmental Inventories for 1978, 1979.

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