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## Imaging Systems

September 20, 1979

Boyce H. Grier, Director  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Grier:

This letter is in response to IE Bulletin #79-19. NRC license #20-17516-01 does use radioactive waste barrels for disposal of low level radioactive waste. Attached is the protocol which you requested.

If you require any additional data, it will be sent to you immediately.

Sincerely,

David Jeffries  
Radiation Safety Officer

DJ/pn

cc: NRC Office of Inspection and Enforcement  
Division of Fuel Facility and Materials Safety Inspection  
Washington, DC 20555

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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?

ANSWER:

	<u>1978</u>	<u>1979</u>
Shipments Made	0	0
# Of Barrels Shipped	0	0

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

ANSWER:

None - but may ship small quantities in the future (not more than 25 millicuries will be shipped at one time).

Isotopes -  $^{57}\text{Co}$ ,  $^{137}\text{Cs}$ ,  $^{22}\text{Na}$ ,  $^{195}\text{Au}$

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

ANSWER

Yes - the attached Interex Corporation's protocol for liquids is followed on the attached protocol "Users of Radioactive Material with Relatively Short Half Lives".

UCIS  
September 20, 1979

879 304

A. Radioactive waste with relatively short half-lives will be stored until it decays to background. After monitoring of the decayed radioactive waste and recording the results of the measurement, the radioactive waste will be disposed of into regular waste.

B. Solid Waste potentially contaminated with radioactive material will be monitored with an appropriate survey instrument to ensure that no detectable radioactivity remains before disposal by normal methods. Any shielding material will be removed before monitoring.

C. Liquid Waste

Liquid byproduct material will either be disposed of via the sanitary sewer system in quantities not exceeding ten times the values listed in Appendix E, Table 1 Column 2 of Title 10, Part 20, Code of Federal Register or allowed to decay to background, monitored and disposed of via the sanitary sewer system or into the regular waste. A separate sink disposal list will be kept at the sink to ensure that limits specified in Section 20.303 of 10 CFR20 are not exceeded.

UCIS  
September 20, 1979

879 305

PACKAGING OF LOW LEVEL RADIOACTIVE  
WASTE FOR TRANSPORT AND BURIAL

Effective immediately the following procedures are in effect:

1. A current set of DOT and NRC regulations concerning the transfer, packaging, and transport of low level radioactive waste material will be maintained.
2. If barrels are used for the disposal of radioactive waste material the attached guidelines from the Interex Corp. will be followed.
3. The Radiation Safety Officer is designated to be responsible for the safe-transfer, packaging and transport of low level radioactive material.
4. The attached requirements of the Interex Corp. concerning operating procedures involved in the transfer, packaging and transport of low level radioactive material will be strictly followed.
5. The consultant Physicist will provide training and periodic retraining in the DOT and NRC regulatory requirements and the waste burial license requirements and in the instructions and operating procedures for all personnel involved in the transfer, packaging and transport of radioactive material. A record will be made of training dates, attendees, and subject material for future inspections of NRC personnel.
6. The consultant Physicist will 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

PACKAGING OF LOW LEVEL RADIOACTIVE  
WASTE FOR TRANSPORT AND BURIAL

Page 2 of 2

and shipment to a low level radioactive waste burial facility.

7. The consultant Physicist will establish and implement a management-controlled audit function for 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.
  
8. Within 60 days of August 10, 1979 a management controlled audit will be performed by the consultant physicist of the activities associated with the transfer, packaging and transport of low level radioactive waste. A record will be kept of this audit.

879 307