BALTIMORE GAS AND ELECTRIC COMPANY

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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

September 28, 1979

Office of Inspection & Enforcement U. S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, Pennsylvania 19406 Docket Nos. 50-317 50-318

ATTENTION: Mr. Boyce H. Grier, Director

Gentlemen:

IE Bulletin No. 79-19 concerns packaging of low-level radioactive waste for transport and burial. Enclosure (1) to this letter responds to the items addressed in this Bulletin pertaining to Calvert Cliffs Units 1 and 2.

Should you have any questions regarding this reply, we will be pleased to discuss them with you.

Very truly yours,

A. E. Lundvall, Jr.

Vice President - Supply

AEL/LBR/n1b

Enclosure (1)

1261 347

Q 7911020 182

Enclosure (1)

Reply to NRC Letter dated August 10, 1979 NRC IE BULLETIN NO. 79-19

Item 1. Response

A current set of DOT and NRC regulations concerning the transfer, packaging and transport of low-level radioactive waste materials are maintained at Calvert Cliffs.

Item 2. Response

A current copy of Chem-Nuclear Systems, Inc. State of South Carolina Radioactive Materials License No. 097 is maintained at Calvert Cliffs.

Item 3. Response

Personnel in our organization who are responsible for the safe transfer, packaging and transport of low-level radioactive material are designated in writing.

Item 4. Response

Plant management approved detailed instructions and procedures based on DOT and NRC regulatory requirements, Chem-Nuclear Systems, Inc. State of South Carolina License No. 097, Hittman Nuclear and Development Corp's NRC Certificate of Compliance and cask handling procedures are provided to those personnel involved in the transfer, packaging and transport of low-level radioactive material.

Item 5. Response

Training and retraining in plant procedures (based on DOT and NRC regulatory requirements and the waste burial license requirements) is provided to appropriate personnel involved in the transfer, packaging and transport of radioactive material and is accomplished by "on-the-job" training. Records are maintained as to qualifications to perform transfer, packaging and transport of radioactive materials.

Item 6. Response

1261 348

On-the-job training has been utilized to provide initial training and periodic retraining to those individuals responsible for operation of compactible low-level radioactive waste to aid in volume minimization. At the present time, only dry waste and dewatered spent resin is being shipped to a low-level radioactive waste burial facility. In the event that other physical and chemical forms of waste becomes necessary for

transfer and shipment to a low-level radioactive waste burial facility, appropriate training and periodic retraining will be provided to those personnel who operate the processes which generate such waste. This will assure volume minimization and processing into acceptable chemical and physical form for transfer and shipment to the burial facility.

Item 7. Response

Establishment and implementation of a management-controlled audit function of all transfer, packaging and transport activities is under consideration. Periodic audits of implementating of our instructions and procedures on these activities are performed by a management-controlled Quality Assurance Program.

Item 8. Response

An audit of the activities associated with the transfer, packaging and transport of low-level radioactive waste originally scheduled for November 1979 was rescheduled as a result of this bulletin. It is currently being performed by our Quality Assurance Department.

Item 9.1 Response

Information reported in accordance with Technical Specifications.

Item 9.2 Response

Information reported in accordance with Technical Specifications.

Item 9.3 Response

No liquid low-level radioactive waste is presently generated.