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November 30, 1979

1-119-21
2-119-14

Mr. K. V. Seyfrit, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Comm.
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Arkansas Nuclear One-Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Revised Response to I.E. Bulletin 79-19
(File: 1510.1 and 2-1510.1)

Gentlemen:

By letter dated September 28, 1979, we provided our initial reponse to the subject bulletin. As a result of the review of the waste management audit required by the subject bulletin, attached is a revised response to the bulletin. The vertical lines indicate which responses have been changed.

Very truly yours,

David C. Trimble

David C. Trimble
Manager, Licensing

DCT/MAS/ew

Attachment

cc: Mr. W. D. Johnson
U. S. Nuclear Regulatory Comm.
P. O. Box 2090
Russellville, Ark. 72801

Mr. James A. Sniezek, Director
Division of Fuel Facilities and Materials
Safety Inspection
NRC Office of Inspection and Enforcement
Washington, D. C. 20555

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Attachment A
Response to IE Bulletin 79-19

Item 1. Maintain a current set of DOT and NRC regulations concerning the transfer, packaging and transport of low-level radioactive waste material.

Response: ANO's current set of DOT and NRC regulations concerning transfer, packaging and transport are revised continually as changes are proposed and implemented by DOT and 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 a waste collection contractor is used, obtain the appropriate requirements from the contractor.

Response: Current burial site regulations and license requirements are maintained at ANO for the Barnwell burial site. Site and license regulations for Nevada and Washington will be available before any radwaste shipments are initiated to these sites but no later than January, 1980. These burial site regulations are updated when changes are identified and implemented by the subject states or burial site operation.

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: Although no individual has previously been designated in writing, the Health Physics Supervisor at Arkansas Nuclear One has been responsible in the past for the safe transfer, packaging and transport of low-level radioactive material. An individual now has been designated in writing to perform these tasks.

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: Pursuant to the audit performed in response to item 8 of IE Bulletin 79-19, revised procedures relating to NRC, DOT, and state waste burial license requirements are being prepared. These procedures will be completed in January, 1980 and will be approved for implementation by February, 1980.

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 inspection by NRC personnel.

Response: Consistent with the audit referenced in Item 4, above, and the implementation of revised procedures relating to DOT and NRC requirements and waste burial license requirements, training of responsible ANO personnel will commence in February, 1980, on implementation of these revised procdures. Training and retraining will be performed on a regular basis consistent with ANO's needs and the overall radwaste training program.

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: The radwaste operations, including operating procedures, are currently being reviewed and will be revised as required. This radwaste operational review will be completed by April, 1980. Based upon this review, a training program will be developed and implemented by June, 1980 and initial training of all ANO personnel responsible for radwaste process operation will be completed by July, 1980. A retraining program including radwaste processing and radwaste packaging and transport will be in-place upon completion of initial training. Retraining will occur as necessary to reflect changes in operating procedures and governing regulations. Such retraining will occur at least annually.

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: A management-Controlled audit will be performed as necessary, but a minimum of once a year, 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.

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: A management-controlled audit of our activities associated with the transfer, packaging and transport of low-level radioactive waste has been performed. A record of all audits will be maintained for future inspection by NRC or DOT inspectors.

The following is provided to answer the questions asked on page 3 of IE Bulletin 79-19 for 1978 and the first six months of 1979:

1. For 1978, 26 shipments of low-level radioactive wastes were made. This consisted of approximately 7850 cubic feet. For the first six months of 1979, 10 shipments of low-level radioactive waste were made. This consisted of approximately 5041 cubic feet.

2. For 1978, approximately 460 curies of low-level radioactive waste were shipped. For the first six months of 1979, approximately 750 curies of low-level radioactive waste were shipped. The major isotopes in the low-level radioactive waste included:

Cr - 51	Nb - 95	Sb - 125
Mn - 54	I - 131	Sr - 90
Mn - 56	Cs - 134	
Fe - 59	Cs - 137	

Co - 58	Cs - 138
Co - 60	H - 3
Co - 57	Ag - 110m
Zr - 95	Sb - 122

3. Liquid radioactive waste was generated. No liquid radioactive waste was solidified or shipped, but was processed, treated, and released in accordance with Technical Specification limits.