

TOXICOLOGY  
DEPARTMENT



Stauffer Chemical Company  
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Central Files  
TERA

November 13, 1979

Dr. Boyce H. Grier  
Director, United States Nuclear  
Regulatory Commission  
Region #1  
631 Park Avenue  
King of Prussia, PA 19406

Dear Dr. Grier:

In response to IE Bulletin 799-19, we have taken the following plan of action with regards to radioactive waste disposal procedures.

1. We have obtained and will continue to maintain the correct sets of Department of Transportation and Nuclear Regulatory Commission regulations concerning the transfer, packaging, and transport of low-level radioactive waste material.

2. We have contracted with Nuclear Diagnostics Laboratories, Inc., of Peekskill, New York, for low-level radioactive waste disposal services. We are obtaining from them the appropriate requirements concerning packaging of low-level radioactive waste material for transfer and shipment to Agreement States.

3. The persons at the Environmental Health Center of the Stauffer Chemical Company in Farmington, Connecticut, who are responsible for the safe transfer, packaging, and transport of low-level radioactive material, are as follows:

Dr. Bruce O. Stuart - Radiation Protection Officer  
Dr. Mitchell W. Sauerhoff - Metabolism  
Dr. Joanne M. Killinger - Biochemistry  
Dr. Dale W. Matheson - In Vitro Toxicology

4. Prior to this writing we have provided instructions to all Environmental Health Center personnel concerning handling, monitoring, transfer, packaging, and transport of low-level radioactive material. We are currently amplifying these instructions with emphasis upon necessary procedures for different chemical and physical forms of the low-level radioactive material.

5. Prior to this writing we have provided training concerning radioactivity and radioactive materials and proper techniques for handling and disposal of these materials to all personnel, both scientific and technical, that may be in any way involved in the handling of radioactive materials. We have scheduled periodic training and retraining in DOT and NRC regulatory requirements for these personnel on a bi-monthly basis. Records of these training dates, attendees, and subject material are being maintained.

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6. During the same training sessions, as indicated in Item 5, there will be training and retraining of all employees involved in processes that may generate low-level radioactive waste to assure minimal volume of such waste and to ensure that such waste is packaged in acceptable chemical and physical forms.

7. We are in the process of implementing a management-controlled audit function of transfer, packaging, and transport activities to assure that personnel instructions and procedures in process and transport equipment are functioning and will continue to function safely and in compliance with regulatory requirements.

8. A management controlled audit of the Environmental Health Center activities associated with the transfer, packaging, and transport of low-level radioactive wastes will be conducted during the month of November.

The following answers are provided covering the periods of 1978 and the first six months of 1979:

1. "How many low-level radioactive waste shipments did you make?  
What was the volume of low-level radioactive waste shipped?"  
Answer: Our license was signed and dated July 24, 1979. We made no radioactive waste shipments during 1978 or during the first six months of 1979.
2. "What was the quantity (curies) of low-level radioactive waste shipped?  
What were the major isotopes in the low-level radioactive waste?"  
Answer: Again, no low-level radioactive waste was shipped during either 1979 or the first six months of 1979. When our first shipment of waste is made, the principal isotopes will be very low-level quantities of Carbon-14.
3. "Did you generate liquid low-level radioactive waste?"  
Answer: We generated no liquid low-level radioactive waste during 1978 or the first six months of 1979.

We trust that the required information concerning IE Bulletin 799-19 is contained in the above. Please let us know if further information is desired.

Sincerely,



Bruce O. Stuart, Ph.D.  
Radiation Protection Officer  
Environmental Health Center