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School of Civil Engineering
and Environmental Science

October 16, 1979

Karl V. Seyfrit, Director
Region IV
Office of Inspection and Enforcement
USNRC
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76012

Re: IE Bulletin No. 79-19

Subject: Packaging of low-level radioactive waste for transport and burial

In response to item #9 under "action to be taken by licensees," the following is a list of our responses:

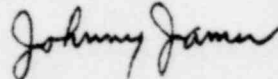
A) Plan of action and schedule for items #1 through #8.

- 1) We currently have both DOT and NRC regulations concerning the transfer, packaging, and transport of low-level radioactive waste material and hope to be able to maintain the latest versions of the regulations as long as we receive the updates and changes from the appropriate government agencies.
- 2) We have on file the set of appropriate requirements from our collection contractor.
- 3) We have designated, in writing, the people in our organization who are responsible for the safe transfer, packaging, and transport of low-level radioactive material.
- 4) We plan to provide updated and detailed instructions and operating procedures to all personnel involved in the transfer, packaging, and transport of low-level radioactive material. The new instructions and operating procedures will be submitted to the Radiation Safety Committee for review and approval.
- 5) Since currently we have only one person involved with low-level waste transfer, packaging, and transport, (the University Health Physicist) the training and retraining in the DOT and NRC regulatory requirements will consist of that individual reading and keeping on file the changes in the rules and regulations as they become available.

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- 6) Providing training and periodic retaining to those employees who operate the processes which generate the waste material will be discussed at the next meeting of the Radiation Safety Committee.
 - 7) The establishment and implementation of a management-controlled audit function of all transfer, packaging, and transport activities to provide assurance that personnel, instructions and procedures, and processes and transport equipment are functioning to ensure safety and compliance with regulatory requirements will be discussed at the next meeting of the Radiation Safety Committee.
 - 8) Due to the reorganization of the Radiation Safety Committee and the appointment of a new Radiation Safety Officer a management-controlled audit of our activities associated with the transfer, packaging, and transport of low-level radioactive will have to be delayed until the committee has time to review and assess their function in this area.
- B) Responses to the three questions concerning our low-level radioactive waste shipments for 1978 and the first six months of 1979.
- 1) We made one low-level radioactive waste shipment during the time period with the volume being 13-55 gallon barrels of low-level waste.
 - 2) The low-level radioactive waste shipment contained ~0.04 Curies of ^3H and ~0.008 Curies of ^{14}C .
 - 3) Yes. According to the requirements from our collection contractor, we do not have to solidify our low-level liquid waste.

Sincerely,



Johnny James
Health Physicist

cc: Dr. Klehr, RSO
Dr. Petry, Chairperson, Radiation Safety Committee
Members, Radiation Safety Committee

JJ:st