



ARKANSAS POWER & LIGHT COMPANY
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

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PDR

PR 61

(43 PR 49811)

040-1

April 14, 1980

Mr. John B. Martin, Director
Division of Waste Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Arkansas Nuclear One-Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
10 CFR Part 61: Disposal of Low-
Level Radioactive Waste and Low-
Activity Bulk Solid Waste
(File: 1511.3, 2-1511.3)

Gentlemen:

We have reviewed the subject document and feel that several comments should be made.

In Section 61.14, the term Licensee is defined as the holder of a license "issued under the regulations in Parts 30, 40, 50, 60, 61, or 70 of this chapter." This term is used rather loosely throughout the document. In some instances, it is not clear as to whether reference is being made to the waste disposal facility operator or to all licensees as defined above. In most cases, the term Applicant is used in references to the waste disposal facility operator, although the term is not defined as such anywhere. As the holder of two licenses issued under 10 CFR Part 50, we feel this ambiguity should be resolved in order for us to correctly interpret the regulations as they will apply to us.

Section 61.81 Waste Form and Packaging states that "The solidified product shall be in a dry, free standing, homogeneous, monolithic matrix..." The use of the word "homogeneous" here is not clear to us. For example, the solidification of resin beads would not form a "homogeneous" product as the resin beads would be dispersed throughout the solidification media. We suggest that "homogeneous" be removed from this sentence.

The same section also states that "Low activity dewatered resins and dewatered resins in a high integrity container may be accepted for disposal." No where are the terms "low activity" and "high integrity container" defined, as they apply to dewatered resins. Definition of these terms would enable us to better analyze the impact which solidification would have on the operation of our power plant.

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We feel that a very careful analysis of the requirement to solidify all low level radioactive wastes is required. The analysis should concentrate on the increased volumes of wastes which would be generated by solidification and the current and future volume requirements that will be implemented by the burial site operators and the Agreement states. It should be noted that solidification increases the volumes of waste generated while at the same time, volume allocations at burial sites are decreasing.

We appreciate the opportunity to comment on this document and hope that our comments will be helpful in revising the document. If you have any questions on this matter, please contact me at (501)371-7825 or Mr. Mark Smith at (501)371-8236.

Very truly yours,

David C. Trimble

David C. Trimble
Manager, Licensing

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PR 61
(43 FR 4981)

ROUTING AND TRANSMITTAL SLIP		ACTION	
1 TO (Name, office symbol or location) JBMartin, WM REBrowning, WM RDSmith, WMLL	INITIALS	CIRCULATE	
	DATE	COORDINATION	
2 PHLohaus, WMLL GROles, WMLL (2) Charles Nichols, SD Robert Fonner, ELD	INITIALS	FILE	
	DATE	INFORMATION	
3 RMacDougall, WMPI File (Taube) PDR - PR 61 (43 FR 4981) ← DCS, 016	INITIALS	NOTE AND RETURN	
	DATE	PER CON - VERSATION	
4	INITIALS	SEC ME	
	DATE	SIGNATURE	
REMARKS			
Attached, for your information, are comments on the preliminary draft of 10 CFR Part 61.			
Do NOT use this form as a RECORD of approvals, concurrences, disapprovals, clearances, and similar actions.			
FROM (Name, office symbol or location) Taube P. Heddings, Licensing Assistant Low-Level Waste Licensing Branch, Division of Waste Management	DATE		
	PHONE	74433	