

UNC NAVAL PRODUCTS

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Division of United Nuclear Corporation
A UNC RESOURCES Company

67 Sandy Desert Road
Uncasville, Connecticut 06382

Telephone 203 848-1511

In reply, please refer
to: NIS-80-4-25

April 14, 1980

Mr. Boyce H. Grier, Director
U. S. Nuclear Regulatory Commission
Region 1
630 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: Low-level Radioactive Waste

- Reference:
1. Letter - Boyce H. Grier, NRC Region 1, To United Nuclear Corporation, Naval Products Division, Dated August 10, 1979, On IE Bulletin No. 79-19, "Packaging Of Low-level Radioactive Waste For Transport And Burial
 2. Letter - James H. Snizek, NRC-Washington To United Nuclear Corporation, Naval Products Division, Dated September 7, 1979, On IE Information Notice No. 79-21, Transportation And Commercial Burial Of Radioactive Material
 3. Letter - D. E. Ganley, United Nuclear Corporation, Naval Products Division, Dated October 2, 1979, To B. H. Grier On Subject

Dear Mr. Grier:

In reply to Reference 1, Paragraph 9, our comments follow:

Paragraph 1 - Current Set Of DOT And NRC Regulations

We maintain such information.

Paragraph 2 - Current Set Of License Requirements - Burial Site And/Or Collection Contractor

We possess partial Chem-Nuclear license requirements for the Barnwell, South Carolina site and NECO abstracted license requirements for shipment to and burial at the Hanford, Washington or Beatty, Nevada sites. We are endeavoring to obtain the specific current license requirements of NECO for packaging, transportation, and burial at

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Mr. Boyce H. Grier
U. S. Nuclear Regulatory Commission

April 14, 1980

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Paragraph 2 - (Continued)

any site at which our radioactive waste will be buried. No further shipments shall be made to any site by a waste broker/transporter for which detailed State or NRC license requirements are not in our possession, as emphasized by Reference 2, Paragraph 3.

There are problems in NECO locating some of the older reference documents which, unfortunately, are noted in catchall license conditions; or alternately stating in writing that we do not need to comply with the documents. Paragraphs A, C, D, and E apply to past shipments. Paragraphs A7, B, and E would apply to future shipments.

Examples are given below:

A. Chem-Nuclear, Barnwell, South Carolina Amendment No. 10 to License No. 097, Condition 34 and Amendment No. 16, Condition 7:

34. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Condition 10 of this license in accordance with statements, representations, and procedures heretofore made by the licensee in application for and subsequent to the issuance of South Carolina Radioactive Material Licenses 097, 128-01, 128-02, and 128-03, and amendments thereto; and application dated February 24, 1975, and letters dated February 21 and March 25, 1975 and July 10, 1975, signed by H. R. Oakley.

7. Operations shall be conducted in accordance with Chem-Nuclear Systems, Inc. Quality Assurance and Procedures Manual, dated April 4, 1977.

B. NECO, Beatty, Nevada License No. 13-11-0043-02, Condition 21 and 9C:

21. Except as specifically provided otherwise by this license, the licensee shall receive, possess, and dispose of radioactive materials in accordance with statements, representations, and procedures contained in the following documents:

A. Nevada State Board of Health Form NRC-5, "Application for Radioactive Material License", signed by James N. Neel, dated December 8, 1976.

Mr. Boyce H. Grier
U. S. Nuclear Regulatory Commission

April 14, 1980

Paragraph 2 - (Continued)

B. 21. (continued)

- B. "Relicensing Application and Geotechnical and Waste Management Studies for the Beatty Nuclear Disposal Site, Nye County, Nevada, December, 1976".
- C. "Nuclear Engineering Company, Inc., Radiological Controls and Safety for Burial Sites Manual".
- D. "Site Operations Manual for Low Level Radioactive Waste Disposal at Beatty, Nevada".

9. C. Notwithstanding the requirements of 9.B, small quantities of liquid waste may be disposed of without solidification provided that the concentration, quantities, and packaging of these liquids is in accordance with Section 5 of the licensee's "Site Operations Manual".

C. NECO, Hanford, Washington NRC License No. 13-10042-01, Amendment No. 8, Conditions 4 and 11:

- 4. Except as specifically provided otherwise by this license, the licensee shall receive, process, repackage, store, and dispose of by-product, source, and special nuclear material in accordance with the radiological safety procedures and limitations contained in the application dated October 23, 1964, as amended December 9, 1963; April 21, 1964, August 18, 1964; August 28, 1964; September 18, 1964; October 12, 1964; February 3, 1965; November 24, 1965; and March 31, 1966; and in the application dated August 16, 1966, as amended August 31, 1966; September 9, 1966; September 14, 1966; October 3, 1966; and March 7, 1967 (hereafter collectively referred to as the "application").
- 11. Special nuclear material may be disposed of by burial at a site located in the southeast corner of Section 9, Township 12, North Range 26 EMW, Benton County, Washington, in accordance with procedures and limitations set forth in the application dated August 18, 1964, and amendments thereto dated August 28, 1964; September 18, 1964; and February 3, 1965.

Mr. Boyce H. Grier
U. S. Nuclear Regulatory Commission

April 14, 1980

Paragraph 2 - (Continued)

- D. NECO, Hanford, Washington License No. WN-1019-2, Amendment 10 has not been obtained.

In addition, the situation with respect to the current NRC license at Hanford is so unsettled that NECO is not accepting any SNM shipments to the Hanford site.

- E. Chem-Nuclear, Barnwell, South Carolina NRC License No. 46-13536-01, Amendment No. 18, Condition 3:

3. Except as specifically provided otherwise by this license, the licensee shall possess and use licensed material described in this license in accordance with statements, representations, and procedures contained in applications dated December 16, 1974, as amended April 16, 1975, and July 14, 1975; application dated September 8, 1975, as amended December 10, 1975; letter dated September 16, 1975; application dated January 7, 1977; letter dated June 13, 1978; letters dated November 22, 1977, December 7, 1977, and December 13, 1977; letter dated April 13, 1979; application dated December 13, 1978 and letter dated April 11, 1979; and application dated February 20, 1979 and letters dated May 11, 1979 and July 26, 1979.

Paragraph 3 - Designate Responsible Organizational Positions

Responsibilities have previously been designated in writing in our SNM Shipping Guide, issued in 1976. New procedures to be issued prior to any low level waste shipment will supplement these responsibilities.

Paragraph 4 - Management Approved Procedures

Such procedures exist in our SNM Shipping Guide. These procedures shall be reviewed with special attention to low level radioactive material and packaging integrity and revised, if necessary, prior to any further shipments to low level burial sites.

Paragraph 5 - Provide Training/Retraining For Personnel In Packaging, Transfer, And Transport With Supporting Written Records

Personnel training was previously performed in the areas noted in detail in Reference 1, Paragraph 5, but records were not maintained to the details now specified. The system required shall be implemented prior to any future shipment of low level waste.

Mr. Boyce H. Grier
U. S. Nuclear Regulatory Commission

April 14, 1980

Paragraph 6 - Provide Training/Retraining For Personnel That Generate Waste For Burial

Such evaluation and control was performed in the past as related to economical handling. Due to the rapidly escalated costs, decrease in available sites, and public sensitivity, increased emphasis shall be devoted to this subject. Full implementation will be by June 1, 1980.

Paragraph 7 - Management Controlled Audit

Presently, the Nuclear and Industrial Safety Department performs audits of transfer, packaging and transport activities.

Paragraph 8 - Audit Within 60 Days Unless Performed Within The Last 6 Months

The next audit of low level wastes to burial shall be made in association with preparation for the next shipment to burial. It should also be noted that UNC personnel have performed inspections in the course of accompanying DOE and NRC inspectors, although not formally documented as an inspection by our personnel.

No low level waste shipments have been made since September 24, 1979. We have continued, in the period of time since receipt of 79-19, to attempt to remain current with the many events occurring in the radioactive waste burial field. Essentially, we have performed a continued management-controlled and management-involved program audit to prepare ourselves for the next shipment of low level waste to burial that we will make.

Considering Items 1 through 6 of IE Bulletin No. 79-19:

1. We have a current set of DOT and NRC regulations.
2. We are continuing to try to obtain a complete set of burial site requirements for past, and forthcoming burials. A number of referenced documents have not yet been supplied by NECO. The applicability of the documents to our responsibilities remains to be clarified.
3. Currently exists in our SNM Shipping Guide.
4. Basic information currently exists in our SNM Shipping Guide. Further detailed instructions will be provided that are burial site specific.
5. & 6. Training will be provided as detailed procedure are finalized for burial destinations.

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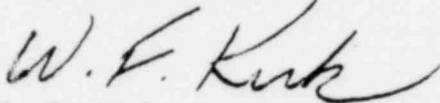
April 14, 1980

Answers to the three questions on 1978-79 shipments of low level radioactive waste have been supplied by Reference 3.

While we do not generate radioactive liquid in solution form for burial, we do have materials that are wet with water or oil to form mixtures (i.e., solid particulates plus liquid). We have shipped small amounts of damp solid filters double bagged in plastic in 55 gallon steel drums, sludges in heavy wall capped/sealed plastic bottles with absorbent in 55 gallon steel drums, and tank sludges, solidified with concrete, in steel drums with absorbent on top of the concrete to absorb small amounts of excess water.

We have earnestly worked to answer your requirements. Should further information be required, please contact us.

Very truly yours,



W. F. Kirk, Manager
Nuclear & Industrial Safety

jr

cc: U. S. Nuclear Regulatory Commission
Office Of Inspection and Enforcement
Division of Fuel Facility and Materials
Safety Inspection
Washington, D. C. 20555