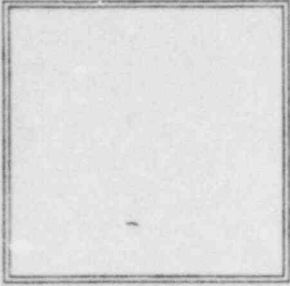


June 12, 1980

TIC



Ms. Rose Douglas  
U.S. Nuclear Regulatory Commission  
Office of Public Affairs  
Region II  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

79-19

Dear Ms. Douglas:

Per your inquiry, attached is the response to the August 10, 1979  
IE Bulletin. As you can see, it was sent to Mr. James G. Keppler.

If you have any further questions, please call me at (216) 368-2906.

Sincerely yours,

Thomas A. Bozich, Director  
Security and Environmental Affairs

TAB/jmb

att.

JUN 16 1980

September 26, 1979

Mr. James G. Keppler  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

In accordance with IE Bulletin No. 79-19, dated August 10, 1979, the following is our plan of action and schedule for compliance with each of the numbered items listed in that document:

1. Currently in compliance.
2. Currently in compliance in regard to requirements which have been provided by our radioactive waste disposal contractor. As a result of a recent change in the burial facility used by our contractor, new requirements were obtained, incorporated in our guidelines and disseminated. The copy of the actual burial facility license upon which the requirements were presumably based, have been requested and are expected momentarily.
3. Some of the people responsible had already been designated in writing; a few of these however had been designated only verbally. This latter group will be designated in writing prior to the end of the 60 day compliance period.
4. Currently in compliance, except for incorporation of the new procedures which were disseminated on August 9, 1979, into the permanent "Rules and Procedures for Handling Nonhuman Use Radioactive Materials."
5. Regulatory requirements and burial license requirements are reviewed by the RSO and incorporated into the "Rules and Procedures ----." The disposal area monitors are then individually instructed on an individual "as required" basis by the RSO or his assistant. Bi-weekly waste disposal area site visits are accomplished by the RSO assistant, providing additional training and instruction as required at that time.

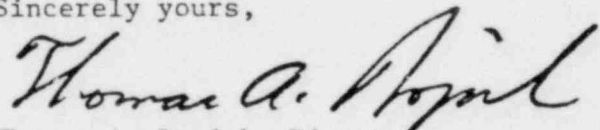
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6. Training to minimize waste volumes is provided through the "Rules and Procedures ----" and through incentive as the Primary Investigators are charged for waste disposal based upon volume. While initial preparation is accomplished by the Primary Investigators, the final preparation and processing is accomplished at the waste disposal areas under the supervision of the monitors. The monitors are trained on a continuous basis by the RSO assistant as previously outlined.

The following are answers to the additional questions raised in IE Bulletin No. 79-19:

	<u>1978</u>	<u>6 mo. 1979</u>
1. Shipments:	7	3
Volume:	2290 ft. <sup>3</sup>	1160 ft. <sup>3</sup>
2. Curies Shipped:	3.45	1.37
Major Isotopes:	(H-3, C-14, I-125, P-32, S-35)	
3. Liquid Waste:	Yes	Yes
Process:	(Packed in 2X vermiculite)	

Sincerely yours,



Thomas A. Bozich, Director  
Security and Environmental Affairs

TAB/lad

cc: IE, FFMSI, Wash. D.C.

Sources of Information:

The DOT regulatory requirements can be found in 49 CFR Parts 170-179. The NRC regulatory requirements can be found in 10 CFR Parts 19 to 71. The NRC regulatory requirements for Agreement State licensees in non-agreement states are in 10 CFR Part 150. Copies of the regulations may be purchased from the Superintendent of Documents, U. S. Government Printing Office, Washington, D.C. 20402.

Information about licensing requirements for NRC packages can be obtained from the NRC Transportation Branch (301-427-4122). Information about DOT packaging and transport requirements can be obtained by calling the DOT Office of Hazardous Materials (202-426-2311).

Action To Be Taken By Licensees:

To assure the safe transfer, packaging, and transport of low-level radioactive waste, each licensee is expected to:

1. Maintain a current set of DOT and NRC regulations concerning the transfer, packaging and transport of low-level radioactive waste material.
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.~~
3. Designate, in writing, people in your organization who are responsible for the safe transfer, packaging and transport of low-level radioactive material.
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.
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 inspections by NRC personnel.
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.

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.
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.)
9. Report, in writing within 45 days, your plan of action and schedule with regard to the above items. In addition, provide responses to the three questions below. Reports should be submitted to the Director of the appropriate NRC Regional Office and a copy should be forwarded to the NRC Office of Inspection and Enforcement, Division of Fuel Facility and Materials Safety Inspection, Washington, D.C. 20555.

Provide answers for 1978 and for the first six months of 1979 to the following questions:

1. How many low-level radioactive waste shipments did you make? What was the volume of low-level radioactive waste shipped?  
  
(Power reactor licensees who report this information in accordance with Technical Specifications do not need to respond to this question.)
2. What was the quantity (curies) of low-level radioactive waste shipped? What were the major isotopes in the low-level radioactive waste?  
  
(Power reactor licensees who report this information in accordance with Technical Specifications do not need to respond to this question.)
3. Did you generate liquid low-level radioactive waste? If the answer is 'yes,' what process was used to solidify the liquid waste?

Licensees who do not generate low-level radioactive waste should so indicate in their responses and do not need to take other actions specified in the above items.

Approved by GAO, B180225 (R0072); clearance expires 7-31-80. Approval was given under a blanket clearance specifically for identified generic problems.