

DEPARTMENT OF THE AIR FORCE

USAF CLINIC, KELLY AFB

KELLY AIR FORCE BASE, TEXAS 75141



19 NOV 1979

REF TO
ATTN OF

SGB

SUBJECT NRC Bulletin No 79-19, Packaging of Low Level Radioactive Waste for Transport and Burial (License No SUB 1291)

TO US Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington TX 76012

IE Bulletin No 79-19 concerning packaging of low level radioactive waste for transport and burial has been carefully reviewed by the Kelly AFB Radiation Protection Officer (RPO). The following is an attempt to answer the items identified in subject bulletin requiring a response by the licensee:

- a. The Bioenvironmental Engineering Service, USAF Clinic Kelly, Kelly AFB, Texas (Base RPO) is maintaining a current set of NRC regulations concerning the transfer, packaging and transport of radioactive waste material. Department of Transportation regulations are maintained at the radioactive materials receiving, storing and shipping warehouse, Bldg 1556-A, Kelly AFB.
- b. The USAF Radioisotope Committee will obtain the license requirements of the Agreement States for subsequent forwarding to the Air Force licensees (Base RPO). Also, technical orders have been rewritten to coincide with NRC, State licensees, and site criteria (see Atch 1).
- c. The personnel who are responsible for the safe transfer, packaging and materials generated at Kelly AFB are: Mr Ollie Williams, SA-ALC/DS, Radiological Monitor, Mr J. J. Rodriguez, Directorate of Maintenance RPO, Base Transportation Officer as described in TO 00-110N-2, All functions of this operation are routinely reviewed by Mr Luther M. Maulden, Base RPO.
- d. Kelly AFB is in compliance with TO 00-110N-2. As solid radioactive waste is generated, it is placed in an approved type metal container with properly fitted lid and labeled with an AFTO Form 9B. Caution is exercised to keep the outside of the container free of contamination. The waste container is monitored with calibrated radiac instruments (AN/PDR-27 or PAC 1-S) to determine the radiation intensity buildup as the waste content is increased. Ionizing radiation levels are routinely monitored to prevent exceeding 200 MR/hr at the exterior surface of the container, or 10 MR/hr three feet from any exterior surface. Should the radiation intensity reach 200 MR/hr at the exterior surface of the container, or 10 MR/hr three feet from the surface before the container is full, the void will be packed with wadding and airtight sealed with a container lid. The SA-ALC/DS Radiological Monitor will inspect the sealed container prior to shipping to Bldg 1556-A via Government vehicle only.

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San Antonio ALC/DSFSW personnel provide adequate storage space for the radioactive waste in a specially assigned area within Bldg 1556-A, Kelly AFB, pending final shipment to a burial site, as instructed by SA-ALC/MMIREB-2. The storage area is routinely monitored by the SA-ALC/DS Radiological Monitor using a calibrated AN/PDR-27 radiac instrument. The Base RPO performs a formal radiological health survey of this area on a quarterly basis. Official inspection records are maintained in both the radioactive material storage area and the Base RPO's office. See Atch 2 for AFTO Form 9B and Atch 3 for additional base regulatory guide.

e. The present 24-hour initial or eight hour refresher training course criteria noted in TO 00-110N-3 will be amended to include periodic training/retraining in the DOT and NRC regulatory requirements and waste burial license requirements. Records of training dates, attendance, and subject material will be maintained for future inspections by NRC personnel. Annual training should be sufficient unless turnover of personnel dictates more frequent training necessary.

f. Initial and periodic training will be provided by or under the direction of the Base RPO to those personnel at Kelly AFB who are involved with the generation of low level radioactive waste.

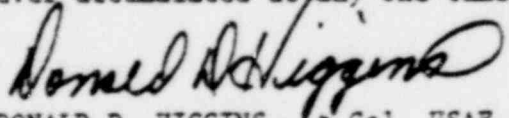
g. The Base RPO performs a management controlled audit on Kelly AFB where radioactive materials are transferred, packaged, stored, or transported on a quarterly basis. These areas are checked to assure compliance with regulatory requirements. A record of these visits are maintained in the Base RPO's office and area of concern. Technical Order 00-110N-2 and NRC license applications requirements are used as an audit guide.

h. Answers to questions 1-3 of Bulletin 79-19, page 3, for 1978 through the first six months of 1979 are as follows:

(1) Three Shipments: Approximately 16.5 pounds

(2) 2.49 mCi: Depleted Uranium 238

(3) Yes: Via vaporization and absorption. Only very small amounts are ever accumulated at any one time.


DONALD D. HIGGINS, Lt Col, USAF, BSC
Chief, Bioenvironmental Engineering Service

5 Atch

1. Cy TO 00-110N-2
2. AFTO Form 9B
3. Cy SA-ALC-KAFBR 67-15
(under revision)
4. Cy Excerpt TO 00-110N-3
(Training)
5. Cy NRC Ltr, 31 Oct 1979

Cy to: (listed on next page)

USNRC, Office of Inspection
& Enforcement
Division of Fuel Facility & Materials
Safety Inspection
Washington DC 20555

AFMSC/SGPZ (Lt Col Moyer)
Brooks AFB TX 78235