DEPARTMENT OF THE AIR FORCE

USAF HOSPITAL KIRTLAND MACI KIRTLAND AFB, NEW MEXICO 87117



REPLY TO ATTH OF

SGPR (505-264-9697)

10 September 1979

SUBJECT: Response to NRC Bulletin No. 79-19 - Packaging of Low Level Radioactive Waste for Transport and Burial

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

> On 28 Aug 1979 the Radiological Health Section/SGPR of Hospital Kirtland, Kirtland AFB, Albuquerque, New Mexico, received your Bulletin No. 79-19 concerning packaging of Low Level Radioactive Waste for Transport and Burial.

The following is an attempt to answer the items identified in subject bulletin requiring a response by the licensee:

- a. The Radiological Health Section at Kirtland AFB is maintaining a current set of DOT and NRC regulations concerning the transfer, packaging and transport of radioactive waste material.
- b. The USAF Radioisotope Committee is sending the necessary documentation indicating the requirements placed on the waste burial firm by the Agreement State of Nevada, South Carolina and Washington.
- c. All Radiological Health Section personnel have been given the responsibility for packaging and transport of low level radioactive waste material by virtue of their experience and education. Nothing in writing has been generated or considered necessary with respect to designation of responsible personnel in this area. However, responsible individuals in the Radiological Health Section will be so designated in writing.
- d. The Radiological Health Section has not yet developed detailed management approved operating procedures for use by section personnel for the transfer, packaging, and transport of radioactive waste materials other than the instructions outlined in the Base Radiation Protection Program Regulation 160-1 and Air Force Technical Order OC-110N-2. The detailed operating procedure requested in subject bulletin will be developed by Radiological Health at the earliest available opportunity.

- e. Periodic training is provided to Radiological Health Section personnel on all facets of the Kirtland AFB Radiation Protection Program and for changes in Federal Regulations affecting that program. Training is provided to all new personnel coming into the Radiological Health Section depending on that individual's previous background and knowledge concerning Federal Regulations covering transfer, packaging and transport of radioactive materials and all other areas involving the implementation of an ongoing Radiation Protection Program. Records of periodic training are being maintained on file by Radiological Health.
- f. Initial and periodic training will be provided by Radiological Health to those personnel at Kirtland AFB coming under the jurisdiction of the Air Force who are involved with the generation of low level radioactive waste.
- g. Radiological Health will establish a management controlled audit by developing a checklist for the transfer, packaging and transport of radioactive waste material at Kirtland AFB. This checklist will allow a disinterested element of management to audit this area to assure compliance with regulatory requirements. A record of these audits will be maintained in the files of the Radiological Health Section.
 - h. Answers to questions 1-3 of Bulletin 79-19, page 3:
- 1. Radiological Health has made no low level radioactive waste shipments in the last six months.

2. N/A

3. Yes, no process was used to solidify liquid low level radioactive waste. Liquid low level radioactive waste is maintained in the storage vault in that form. The only liquid waste presently being generated at Kirtland AFB is I-125 from Hospital Kirtland nuclear medicine program (In-Vitro only).

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Cy to: USNRC, Office of Inspection and Enforcement, Div. of Fuel Facility & Materials Safety Inspection Washington, DC 20555 USAF Radioisotope Committee 1606 ABW/CC AFWL/CC