

DEPARTMENT OF THE AIR FORCE
USAF SCHOOL OF AEROSPACE MEDICINE (AFSC)
BROOKS AIR FORCE BASE, TEXAS 78235



REPLY TO
ATTN OF: RZH

18 September 1979

SUBJECT: Nuclear Regulatory Commission Requirements for Disposal of Radioactive Waste

TO: Nuclear Regulatory Commission - Region IV
611 Ryan Plaza Dr.
Suite 1000
Arlington, Texas 76011

1. In response to IE Bulletin No. 79-19 the following comments are provided for your information:

a. NRC regulations are on hand and are maintained by the Health Physics Branch. DOT regulations are on order with expected delivery date of late September 1979.

b. The current set of requirements placed on the waste burial firm by the Agreement State of Nevada, South Carolina and Washington are forthcoming from the USAF Radioisotope Committee.

c. Personnel from the Health Physics Branch, Radiation Sciences Division will be responsible for proper transfer, packaging and transport of radioactive waste.

d. Management approved instruction and operating procedures have been developed detailing specific procedures which will comply with the requirements (license) of the waste burial firm currently holding the Air Force Contract. In the event of a new Air Force Contractor, new instruction and operating procedures will be developed to comply with their requirements (license). Any changes in Air Force Contractors requirements will be incorporated into the instruction and operating procedures.

e. Proper training and retraining of personnel involved with transfer, packaging, and transport of low-level radioactive material shall be provided by the Health Physics Branch. Records of training dates, attendees and subject material will be maintained by the same branch.

f. The Health Physics Branch will 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.

g. A management controlled audit of activities associated with the transfer, packaging and transport of low-level radioactive waste was conducted by the health physics branch on 11 September 1979. The results

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of the audit was reported to the Isotope and Radiation Source Committee on 12 September 1979. A semi-annual audit will be conducted and the results reported to the I&RS committee by incorporation into the semi-annual license review. The results of the audit of activities on Brooks AFB is included in attachment one (1).

2. The following answers are provided at your request concerning low-level radioactive shipments from Brooks AFB for 1978 and for the first six months of 1979.

a. A total of three (3) shipments, two (2) in 1978 and one (1) in 1979, were made during this time period. The total volume shipped was 2,495 cu ft. (1595 cu ft for 1978 and 900 cu ft for 1979).

b. The total quantity of activity shipped totaled 0.019 Ci. The major radioisotope in the low-level waste included, H-3, Cr-51, Sc-46 and Sr-85.

c. Our facility did generate low-level radioactive waste in liquid form. Sufficient absorbent material is added to assure the liquid forms a damp solid.

Robert E. Tatsch
ROBERT E. TATSCH
Radiation Protection Officer

1 Atch
Audit Report

Cys to: HQ AFMSC/SGPZ
NRC Office of Inspection

DEPARTMENT OF THE AIR FORCE
USAF SCHOOL OF AEROSPACE MEDICINE (AFSC)
BROOKS AIR FORCE BASE, TEXAS 78235



REPLY TO
ATTN OF: RZH

13 September 1979

SUBJECT: Audit of Low-Level Radwaste

TO: I&RS Committee

1. In accordance with action item 8, IE Bulletin No. 79-19, a management - controlled audit of activities associated with the transfer, packaging and transport of low-level radwaste was conducted on 11 September 1979.

2. Attachment 1 indicates the items checked during the audit.

David Hunter

DAVID HUNTER, Capt, USAF, BSC
Assistant, Radiation Protection Officer

1 Atch
Audit checklist

CHECKLIST FOR AUDIT OF TRANSFER, PACKAGING AND TRANSFER OF LOW-LEVEL RADWASTE, BROOKS AFB

ITEMS CHECKED	YES	NO	N/A
CURRENT NRC REGULATIONS ON HAND	✓		
CURRENT DOT REGULATIONS ON HAND - <i>see comments below @</i>		✓	
CURRENT BRANCH OPERATING INSTRUCTIONS ON HAND	✓		
SOLID OR DRY RADWASTE PROPERLY PACKAGED	✓		
LIQUID RADWASTE PROPERLY PACKAGED	✓		
BIOLOGICAL RADWASTE PROPERLY PACKAGED	✓		
SHIPPING CONTAINERS PROPERLY MARKED	✓		
H-3 TOULENE PROPERLY LABELED - <i>see comments below @</i>		✓	
H-3 TOULENE PROPERLY PACKAGED	✓		
TRANSURANICS PROPERLY LABELED	✓		
TRANSURANICS PROPERLY PACKAGED	✓		
LOW LEVEL RADWASTE STORED IN APPROVED AREA	✓		

COMMENTS:

@ Current DOT regulations on hand: these new regulations are in order and should be received by late September 1979

@ H-3 toluene: these steel drums will be specially marked and separated from the other radwaste.

FORM 185f
 NAME: *David Hunter Catlett* SIGNATURE: *David Hunter*