LPDR

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 20, 1980
NRC/TMI-80-138

Docket No. 50-320

Mr. R. C. Arnold
Senior Vice President
Metropolitan Edison Company
100 Interpace Parkway
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Dear Mr. Arnold:

Subject: Interim Solid Waste Staging Facility

Letter TLL-379 dated August 12, 1980, forwarded the Design Criteria documents for the Interim Solid Waste Staging Facility and requested our comments. Our initial review revealed that additional information is required.

The enclosure to this letter is a list of questions and requests for additional information. To facilitate your response, we are prepared to meet with you to discuss our comments in more detail.

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Enclosure: As Stated

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ENCLOSURE

1. To clearly establish the type of waste that the licensee intends to store in this facility, define the term "Low Level" as used in Section 1.0.

2. Describe the features of the design which will ensure that there will be no standing liquids where the wastes will be stored (i.e. how does the design ensure that the liquids drain to the sump and do not remain in the storage area?).

3. Describe the source and the expected amount of liquids released from the facility.

4. Describe the plan for disposition of the liquids in the sump. Include sampling procedures and criteria in the response.

5. Describe the activities that will be ongoing in areas adjacent to the proposed facility. Will shield walls be constructed to minimize exposures to personnel performing work in adjacent areas?

6. Section 4.2 states that "The slab and columns shall be coated to the height necessary to allow decontamination of the surfaces." Describe the method for determining this height.

7. Section 4.3 states that "Only those personnel actively involved in the material handling activities should be allowed inside the fence enclosing the ISWSF." Describe the actions to be taken to ensure this statement is enforced.

8. Section 5.1 states that "The ISWSF will allow separation of Unit I wastes from Unit II wastes." Describe the administrative controls to ensure separation and the physical design features of the facility which ensure separation.

9. The administrative controls on radiation levels, as described in section 5.3, are not clearly understood. Are there separate administrative levels for each type of container depending on which unit originates the waste?

10. Describe the administrative limits and physical design features which ensure that waste containers will not be vertically stacked beyond the ability of the containers to support the weight or beyond the point at which it will not be safe for men or equipment to stack and retrieve the containers.

11. Provide a figure showing the exact location of the ISWSF.

12. Section 5.5.1, last paragraph, states that "The location of the ISWSF also governs the radiation level of packages which may be stored there without shielding." Is it the intent of Table 5-1 to establish this radiation level? If not, provide this data and explain what is meant by the astericked (*) note at the bottom of Table 5-1.

13. Provide the results of the fire hazards analysis required by Section 5.8 and identify the specific fire protection requirements.

14. Describe what is meant by the column labeled "Quantity (per month)." Is this column the estimated waste generation rates? Is the facility being designed to store the waste generated in one month time using the figures in this column?

15. Provide an analysis of offsite hazards under accident conditions.

16. Describe design features to prevent waste containers from being blown away by high winds.

17. Provide a description of the shielding provisions for the packages requiring shielding. Include a description of the method used to determine if the shielding is adequate.

18. Provide a discussion of the maximum time a container will remain in the ISWSF. If carbon steel containers are to remain in storage for greater than two years, provide a detailed analysis of the adequacy of the containers.