



ARKANSAS POWER & LIGHT COMPANY
 POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

June 19, 1981

ØCANØ681Ø5

Director of Nuclear Reactor Regulation
 ATTN: Mr. J. F. Stolz, Chief
 Operating Reactors Branch #4
 Division of Licensing
 U. S. Nuclear Regulatory Comm.
 Washington, D.C. 20555



Director of Nuclear Reactor Regulation
 ATTN: Mr. Robert A. Clark, Chief
 Operating Reactors Branch #3
 Division of Licensing
 U. S. Nuclear Regulatory Comm.
 Washington, D.C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 & 2
 Docket Nos. 50-313 and 50-368
 License Nos. DPR-51 and NPF-6
Request for Interpretation of 10 CFR 10.203(f)

Gentlemen:

A recent NRC Radiological Assessment Team Appraisal resulted in a citation for failing to label containers of radioactive material in accordance with 10 CFR 20.203(f)(1) and (2). While Arkansas Power & Light Company (AP&L) believes the specific situation cited was a violation of the 10 CFR 20.203(f)(1) and (2) guidelines, the Radiological Assessment Team and the Regional NRC Inspector's interpretation of the 10 CFR 20.203(f)(1) and (2) requirements were viewed as impractical and costly if applied to all radioactive material on the ANO site. Specifically, the NRC inspectors desire that we label every container, bag, etc. of radioactive material inside Controlled Access* is virtually impossible to comply with.

In the course of one day, Arkansas Nuclear One (ANO) has generated as many as 2,000 bags of contaminated trash and tools. Most of these packages contain material with contamination levels less than 20,000 DPM/100cm² or less than 1/mr/hr exposure rates. It is AP&L's belief that the intent of the regulation was to prevent severe overexposures (internal or external) and to ensure minimal personnel exposure when working in areas containing packages of

* That portion of the station to which access is positively controlled for radiological protection purposes.

P

8106260068

June 19, 1981

radioactive material. AP&L supports this intent and the ALARA philosophy which is coincidental with this intent. However, the dynamic working environment at a power reactor causes alternative methods of control to be more cost and exposure effective than the labeling of every package generated.

Specific problems with the NRC Region IV interpretation of the regulation involve the following:

- (a) The labeling of every package without regard for the radiological contents of the container or the area in which the package is used.
- (b) The type of information required on the label. No allowance is made for alternate steps such as color coding to display the potential hazard of the material.
- (c) The point in time or situation where the label must be affixed to the package.


To aid in clarification of 10 CFR 20.203(f)(1) and (2) requirements and ensure consistency in radiation protection practices, AP&L requests an NRR statement regarding the following:

- (a) The definition of a container.
- (b) The situation or time when labeling must commence.

Additionally, AP&L desires to know if flexibility is contained within the regulation to allow:

- (a) Color coding to represent the hazardous nature of material rather than labeling and specific written information.
- (b) Posting of areas containing radioactive material containers rather than the labeling of each container.
- (c) The allowance to not label a container or package if the material represents no greater hazard than those conditions that exist in the area in which it is located.

Very truly yours,


for David C. Trivale
Manager, Licensing

DCT:DDS:lp