

EXXON NUCLEAR COMPANY, Inc.

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Mr. R. D. Thomas, Chief
Materials Radiation Protection Section
Region V
U.S. Nuclear Regulatory Commission
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Walnut Creek, CA 94596

February 3, 1983

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License No. SNM-1227
Docket No. 70-1257

Dear Mr. Thomas:

The cover letter transmitting Report No. 70-1257/82-07 incorrectly states that Exxon Nuclear Company, Inc. (ENC) has been the subject of a civil penalty enforcement action by the State of South Carolina. Exxon Nuclear does dispose of low level waste at the Barnwell site in South Carolina, however, all such disposals have been without incident.

The body of this memo is in response to the Notice of Violation dated January 16, 1983 as required by 10 CFR 2.201. The subject Notice concerns a low level waste shipment by Exxon Nuclear to Beatty, Nevada.

History

Prior to the subject violation, shipments of waste by Exxon Nuclear were made using wooden boxes. Experience had shown that it was difficult to obtain a tight seal with wood, particularly between the lid and body of the box. In an effort to better ensure a tight container, we elected to use an all-welded metal box with a gasketed lid. Other licensees reported excellent experience with such containers. The subject shipment was the second of two, each of which contained 28 metal boxes. Each box in these shipments were inspected prior to leaving the plant site. The box responsible for the citation by Nevada was again inspected by Exxon Nuclear personnel at the Beatty site following notification by Nevada State officials. A bulge with a slight crack, though small, was verified. We therefore believe that the load in the box shifted in-transit causing the small metal tear. Our investigations of the incident led us to take the corrective actions listed below.

Corrective Steps

The corrective steps listed below were instituted by Exxon Nuclear following the arrival of one of our metal burial boxes at the Beatty, Nevada site on March 8, 1982 with a small crack (1/32" wide by 5/16" long) in the metal bottom of the box.

1. The inside surfaces and weld seams of the metal burial boxes are inspected by Shipping/Receiving personnel, and again by the technicians who load the boxes, before waste is put into the boxes.

2. A 3/4" thick sheet of plywood or particle board is placed in the bottom of each box which will be loaded with contaminated metal scrap.
3. Heavy metal objects are placed in the box carefully, with the heaviest on the bottom; and as the box is filled, care is taken to avoid an unstable load which could permit a heavy, sharp-cornered object to fall during handling and transporting.
4. The technicians who load the boxes are trained when initially assigned to the job and are given refresher training semi-annually on the Standard Operating Procedures for waste handling. Training is documented. This formal training is supplemented by frequent contacts with their supervisor relative to handling procedures, especially when new or unusual conditions are encountered.
5. The boxes are generally limited to a 2,000 lb. maximum payload (2,440 lb. gross including the weight of the box).
6. In addition to the metal wedges which hold the gasketed cover on the box, metal bands are tightened around the box as a second means of holding the cover tightly on the box, and silicone calking is applied as a second seal of the box closure.
7. The loaded boxes are given a final inspection of all outside surfaces just before they are loaded onto the truck to go to burial. This inspection is performed both by Logistics personnel who prepare the boxes for shipment, and by Licensing & Compliance who records the results of the inspection of each box on a Compliance Audit Form. The ENC Quality Assurance group performs an overcheck of the above inspection actions.
8. Effective April 5, 1982 ENC appointed a Solid Waste Task Force to address solid waste storage and disposal problems. The responsibilities of the Task Force include exploration of modifications and improvements in waste handling procedures, and providing an overview of low-level waste handling such that all applicable regulatory requirements are met in a most cost-effective manner. Membership of the Committee includes personnel from Licensing, Plant Operations, Process Engineering, Radiological Safety, Shipping/Receiving, and Logistics.

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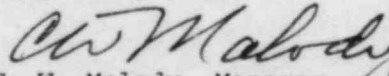
Completion of Corrective Steps and Results Achieved

All of the above corrective measures were in place and being effectively performed by April 30, 1982 by which date we believe Exxon Nuclear Company was in full compliance with regard to the packaging and preparation for shipment to burial of low level waste. No further specific corrective steps are pending. However, ENC through line management and the overview functions of the Solid Waste Task Force, will endeavor to perform the functions of packaging and shipping low-level waste with due diligence and attention to detail such that no infractions of applicable regulations will occur.

As evidence of results achieved following implementation of the procedures identified above, six (6) truck shipments totaling 124 metal burial boxes were transported to and buried at the Barnwell, South Carolina site without incident.

Should you have any further questions, we will be happy to discuss them with you.

Very truly yours,



C. W. Malody, Manager
Licensing & Compliance,
Operating Facilities

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