

SEP 11 1979

MEMORANDUM FOR: J. T. Collins, Deputy Director  
TMI Support

FROM: L Bell  
TMI Support

SUBJECT: COMMENTS ON BRANCH TECHNICAL POSITION LOW-LEVEL  
RADIOACTIVE RESIN AND SLUDGES

1. Page 1, third paragraph, second sentence.

In this sentence, it is stated that "resins and sludges generated by Nuclear power plant..." be solidified. Technically, this is a very restrictive statement. Some flexibility based on the isotopic distribution and radioactivity of the waste should be considered. An evaluation of setting some activity level above which solidification may be required should be considered. Taking this a step further, the benefits to be derived from backfitting plants should be compared to the increase in the protection of public health and safety and the increase in exposure to plant personnel. In addition, the impact of the addition of volume of waste sent to the burial site should be evaluated.

2. Page 3, first paragraph, second sentence to end of the paragraph.

These statements are not accurate. There is a comparison of shipping low-level waste with high activity primary site waste. A number of variables go into activity accumulating on resins. From these statements, there seems to be a lack of understanding of the economics of shipping and packaging of resin. Large sources and large quantities shipments such as resin shipment are not shipped as type A materials. Large source or large quantities are shipped as Type B quantities. This shipping category takes into consideration transportation accidents.

3. Page 3, second paragraph.

What is being said here can equally be attributed to poor site procedures and operations at the disposal site. Solidifying waste will not necessarily solve the problems of surface contamination. Waste handling procedures at the burial site could very well be the controlling factor in surface contamination.

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4. Page 3, Last paragraph.

The need for solidification should be based on the possible effects on public health and safety rather than site maintenance. It should be shown that leaching of dewatered resins and sludges verses leaching from a solidified mass using a particular binding agent presents less of a health hazard.

5. Page 5, second paragraph, second sentence.

What is the basis of this statement?

6. Page 5, B.1

See comment 1 above.

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cc:

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