

South Carolina
Department of
Health and
Environmental
Control

Schneider

BOARD

J. Lorin Mason, Jr., M.D., Chairman
Gerald A. Kaynard, Vice-Chairman
Leonard W. Douglas, M. D., Secretary
Oren L. Brady, Jr.
Moses H. Clarkson, Jr.
Barbara P. Nuessle
James A. Spruill, Jr.

COMMISSIONER

Robert S. Jackson, M.D.
2600 Bull Street
Columbia, S.C. 29201

January 6, 1983

Mr. Donald Nussbaumer
Assistant Director
State Agreements Program
Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. ^{DM}Nussbaumer:

This is in reference to your letter of December 13, 1982, requesting our review of the topical report entitled "Radman, A Computer Code to Classify and Document Packaged LLW in Accordance with 10 CFR 61 Regulation", submitted by Waste Management Group, Inc.

The following comments are offered:

1. One of the most important aspects of waste management is to report accurately the qualified and quantified inventory of radioactive material in the waste form. Therefore, the plant specific data base should rely on plant analysis data.

We note that this program relies heavily on the scaling approach and estimate of radionuclide content based on direct surveys. Even though we approve of this concept, a facility should establish an accurate data base from specific analysis of the waste streams to the extent practical.

The scaling approach to determine transuranic content presents some problems since this method is not well established. Here again the data base and reported waste form should reflect transuranic content based on analysis.

2. It was not clear in the topical report whether physical radiation surveys will be made on container surfaces or calculated. If the latter is the case, it is not acceptable and cannot be substituted for direct measurements.

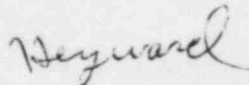
Mr. Donald Nussbaumer
Page Two
January 6, 1983

3. It was noted that the RSR's currently being used at the burial sites will require modification. Therefore, the program cannot be utilized until the forms have been modified and approved by the applicable regulatory agency. Accordingly, the waste classification and manifest system required by 10 CFR Part 61 will not go into effect until it is adopted by the states with regulatory jurisdiction.

Other than what we have outlined above, we have no other particular comments and find overall that it is a valid concept for use by the waste generators, as long as the input data and resulting manifest accurately represents the true content of the waste form.

Should you have any questions, please do not hesitate to contact me or Mr. Virgil R. Autry.

Very truly yours,



Heyward G. Shealy, Chief
Bureau of Radiological Health

HGS:kn