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February 6, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Byron Generating Station Units 1 and 2
Braidwood Generating Station Units 1 and 2
Volume Reduction System
NRC Docket Nos. 50-454/455 and 50-456/457

Reference (a): December 14, 1984 letter from B. J. Youngblood
to D. L. Farrar.

Dear Mr. Denton:

This letter provides the responses to NRC questions 321.100
and 321.103 regarding the Byron/Braidwood volume reduction systems.
This information will be incorporated into the FSAR at the earliest
opportunity.

One signed original and fifteen copies of this letter and
the enclosures are provided for NRC review.

Very truly yours,

T. R. Tramm
Nuclear Licensing Administrator

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Enclosures

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QUESTION 321.100

Provide a description of the procedure that will be used for controlling the quantity of halogenated plastics incinerated in the dry waste processor to the levels specified in AECC-2-P topical report. The response to Question 321.75 is not adequate.

RESPONSE

The amount of halogenated plastics fed to the dry waste processor will be limited through a combination of procurement controls and physical sorting. The effectiveness of these measures will be verified through the use of process instrumentation which measures the pH of the scrub liquor. Maintaining the proper pH will help assure a long life for the processor components but it has no safety significance. If these controls prove to be inadequate additional actions will be taken. The dry waste processor will not be operated for any significant length of time with a low pH in the scrub liquor.

The procurement controls center upon chemical analysis of disposable items stocked in the station storeroom which might be used in contaminated areas and disposed in the drywaste processor. This includes items such as clothing, shoe covers, tape, plastic bags, wipes, mopheads, etc. A list will be maintained which identifies all such materials which have been found to have acceptably low levels of halogenated plastics and those which are high in halogenated plastics. To the extent practical, only items with acceptably low levels of halogenated plastics will be stocked.

Dry active waste (DAW) will be generally collected in bags for transport to the radwaste processing area. Wherever practical, halogenated plastics will be bagged separately at the point of collection for compaction and burial. Bags of mixed DAW will be opened and manually sorted before being put into the trash shredder. The storeroom's lists or other unique markings will be used to identify items having unacceptable levels of halogenated plastics. This sorting will be done under the direction of the Radwaste Foreman. The bags will be opened on a table under a ventilation hood. The personnel who do this work will wear masks and will be specially trained to identify the items which are to be compacted. If significant quantities of unidentifiable materials are found, they will be segregated for further analysis and testing.

It is not expected that this manual sorting will involve significant occupational exposure. Radiation detection instrumentation will be used at the sorting table to identify DAW with significant activity so it can be given special handling.

It is expected that this sorting process will keep the level of halogenated plastic in the DAW feed at an acceptably low level. The scrub liquor low pH alarm will let the operator know if these controls are ineffective. In such a case, the scrub liquor would be transferred back to the feed tanks for pH adjustment or the feed streams would be adjusted to restore the pH to an acceptable value.

QUESTION 321.103

The response to Question 321.76 states that the response to Question 321.75 address the method for controlling the sulfur content in the dry active waste. However, the control of sulfur-containing wastes does not appear to be in that response. Provide a revised response to Question 321.76.

RESPONSE

The same procurement controls and DAW sorting process described in the response to Question 321.100 will be used to limit the amount of sulfur-containing wastes in the DAW fed to the dry waste processor.