



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

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February 22, 1980

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Attachments:
As Stated

ACRSR-0860 PDR 2/22/80	Ltr Plesset to Ahearne, February 13, 1980, re Qualifications of Radioactive Waste System Operating Personnel
ACRSR-0861 PDR 2/22/80	Ltr Plesset to Ahearne, February 14, 1980, re NUREG-0625, Report of the Siting Policy Task Force
ACRSR-0862 PDR 2/22/80	Ltr Plesset to Ahearne, February 13, 1980, re NRC Acceptance for the Mark I Containment Long Term Program
ACRSSM-0170 PDR 2/22/80	Ltr Hard to Siess, July 31, 1970, re Minutes of DRL Meeting at San Onofre Site and in Los Angeles, July 28-29, 1970
ACRSSM-0171 PDR 2/22/80	Ltr Hard to Siess, November 4, 1970, re Notes from DRL/Southern California Edison Meeting on San Onofre 2-3, Bethesda, Maryland, November 3, 1970
ACRSSM-0172 PDR 2/22/80	Ltr Hard to ACRS Members, March 8, 1971, re DRL Meeting on Seismology-Geology for San Onofre 2 & 3, Bethesda, Maryland February 24, 1971
ACRSSM-0173 PDR 2/22/80	Ltr Hard to ACRS Members, February 10, 1972, re Notes from DRL Meeting on San Onofre 2 & 3 Geology-Seismology, Houston, Texas, February 10, 1972
ACRSSM-0174 PDR 2/22/80	Summary of DL Meeting on San Onofre 2 & 3, May 17, 1972 in Menlo Park, California
ACRSSM-0175 PDR 2/22/80	Ltr Quittschreiber to ACRS Members, October 5, 1978, re Summary of Seismic Meeting on San Onofre Units 2 & 3, September 28-29, 1978
ACRSSM-0176 PDR 2/22/80	Ltr Stampelos to Bender, November 19, 1979, re San Onofre 2 & 3 Seismology Meeting in Washington, D.C., November 16, 1979
ACRSSM-0177 PDR 2/22/80	Ltr Stampelos to Bender, December 3, 1979, re San Onofre 2 & 3 Seismology



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ACRSP-0860

PDR 2/22/80

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DUP

Honorable John F. Ahearne
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: QUALIFICATIONS OF RADIOACTIVE WASTE SYSTEM OPERATING PERSONNEL

Dear Dr. Ahearne:

Traditionally, the radioactive waste (radwaste) facility at a commercial nuclear power plant receives less operational and maintenance attention than safety-related or power-generating equipment. This is due largely to the emphasis placed on the latter by the NRC and the utilities' management. During the preoperational and startup test phases of a plant, very little radioactive material is produced, and therefore, mistakes made in operation of radwaste systems are of minor significance. As the plant commences its commercial phase, however, the proper management of radwaste problems becomes more acute as the quantity of radioactive material to be processed increases.

Since plant organizations are developed prior to commercial operation, utilities rarely recognize or anticipate that future problems may occur. Furthermore, once the plant's organization is established, corporate management approvals of staffing changes must be obtained, which can be difficult, especially when additional personnel are requested.

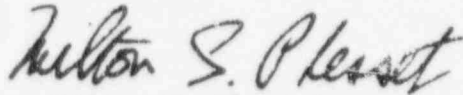
Operation of the radwaste system at nuclear power plants is frequently assigned to personnel at the entry level. The requirements for such a position are normally a high school diploma and a passing grade on the radiation protection examination for plant workers. In general, such personnel are under the supervision of more experienced radwaste system operators. Depending on the operating staff turnover rate, however, the people who supervise the radwaste system may frequently serve in such a position for only a short period of time. Personnel turnover also frequently results in the responsibility for the radwaste system being assumed by a higher level supervisor who has many competing duties. A review of Licensee Event Reports has shown that many mistakes occur in radwaste systems, ranging from equipment damage to inadvertent radionuclide releases. There may well be a cause and effect relation here.

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These problems have been addressed by a few utilities, but additional changes are needed to reduce the number of errors and to improve equipment reliability. The root cause of the radwaste operating problems appears to be the failure of utilities' management to recognize the unique operational problems of such systems.

The Committee believes that NRC evaluation of utilities' organizational arrangements should include consideration of the unique problems associated with the onsite management of radioactive waste and that this should be addressed both at the corporate and plant staff level.

Sincerely,

A handwritten signature in dark ink, reading "Milton S. Plesset". The signature is written in a cursive style with a large, stylized "M" and "P".

Milton S. Plesset
Chairman