



George S. Thomas  
Vice President Nuclear Production

**Public Service of New Hampshire**

New Hampshire Yankee Division

April 14, 1986

SBN-1003  
T.F. B7.1.2

United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Mr. Vincent S. Noonan, Project Director  
PWR Project Directorate #5

Reference: (a) Construction Permits CPPR-135 and CPPR-136,  
Docket Nos. 50-443 and 50-444

Subject: Seabrook Station Process Control Program

Dear Sir:

Section 6.12 of the Seabrook Station proposed Technical Specifications requires that the Seabrook Station Process Control Program (PCP) be approved by the Nuclear Regulatory Commission staff prior to its implementation. A copy of the Seabrook Station PCP is attached for your review and approval. A draft copy of the proposed Seabrook Station Radioactive Effluent Technical Specification 3/4.11.3 for solid radioactive wastes is also included.

The attached PCP presented herein addresses those areas identified in NRC draft document entitled "Guidelines for Preparation of a Solid Waste Process Control Program" with the exception of the following:

1. The PCP describes the program for solidification of Class A wastes. A description of our prequalification program for Class B and Class C waste, as required by section 2.2.2.1.1 "Prequalification Tests" of the draft guidelines, is not provided. New Hampshire Yankee is currently participating in a testing conformance program sponsored by the Waste Chem Corporation. Results of this program shall become available by June, 1986. The objective of the testing program is to demonstrate the ability of the asphalt binder to maintain stability while encapsulating Class B and C wastes. Based upon the results of this testing program, the Seabrook Station PCP will be modified in order to qualify for solidification of Class B and C wastes.

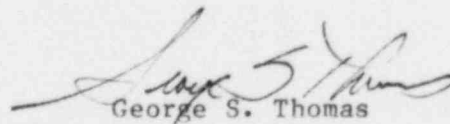
8604170143 860414  
PDR ADOCK 05000443  
A PDR

*B3001  
11/1*

2. The Seabrook Station PCP does not address the production level sampling criteria presented in section 2.2.2.1.2 "Production Level Sampling" of the draft guidelines. NHY believes that the inherent design features of the Seabrook Station Solid Waste System and associated waste testing conformance program do not require such production level sampling. NHY offers the below justification in support of this position.
  - a. The Seabrook Station solid waste system equipment specifications require vendor involvement in a rigorous acceptance test program. Approximately 2,000 gallons of simulated waste will be processed during testing. This program will assure proper operation of the system for turnover to Seabrook Operations.
  - b. A comprehensive test program described in Werner/Pfleiderer (WP) Topical Report WPC-VRS-001 Revision 1, May 1978, has demonstrated the use of a visco-elastic product (Bitumen) for solidification as a mechanical, not chemical, process. The waste form solidifies to a freestanding monolith as it cools down to ambient temperature.
  - c. NHY commits to insuring certification of the incoming asphalt supply for compliance with ASTM-D312-71, as stated in section III-A of the attached.
  - d. Section III of the PCP identifies the minimum operable components without which waste will not be processed. This will avoid producing a waste form with a compromised system.
  - e. If, during processing, the extruder temperature profile remains in an alarm state for over 2 minutes, interlocks prevent the system from further processing.
  - f. NHY will have extensive test data as a result of Branch Technical Position testing performed by Waste Chem as discussed in 1. above.

It is requested that Process Control Program approval be granted prior to issuance of the Operating License. Any questions should be addressed to Dr. Jerry Kwasnik at (603) 474-9574.

Very truly yours,

  
George S. Thomas

GST/lpe

Attachment

cc: ASLB Service List

RADIOACTIVE EFFLUENTS

3/4.11.3 SOLID RADIOACTIVE WASTES

LIMITING CONDITION FOR OPERATION

---

---

3.11.3 Radioactive wastes shall be solidified or dewatered in accordance with the PROCESS CONTROL PROGRAM to meet shipping and transportation requirements during transit, and disposal site requirements when received at the disposal site.

APPLICABILITY: At all times.

ACTION:

- a. With SOLIDIFICATION or dewatering not meeting disposal site and shipping and transportation requirements, suspend shipment of the inadequately processed wastes and correct the PROCESS CONTROL PROGRAM, the procedures, and/or the Solid Waste System as necessary to prevent recurrence.
- b. With SOLIDIFICATION or dewatering not performed in accordance with the PROCESS CONTROL PROGRAM, test the improperly processed waste in each container to ensure that it meets burial ground and shipping requirements and take appropriate administrative action to prevent recurrence.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

---

---

4.11.3 The PROCESS CONTROL PROGRAM shall be used to verify that the properties of the packaged waste meet the minimum stability requirements of 10CFR Part 61 and other requirements for transportation to the disposal site and receipt at the disposal site.