



Carolina Power & Light Company

December 4, 1979

*Central File*  
50-261

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SERIAL: GD-79-3047

Mr. James P. O'Reilly, Director  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
LICENSE NO. DPR-23, 71, & 62  
DOCKET NO. 50-261, 325, & 324

REVISED RESPONSE TO IE BULLETIN 79-19, PACKAGING OF LOW-LEVEL WASTE

Dear Mr. O'Reilly:

In our response to IE Inspection Report No. 50-261/79-12 (dated November 7, 1979), we indicated that we would revise our response to IE Bulletin 79-19 (dated September 21, 1979) to more accurately reflect the situation concerning management-approved procedures for the transfer, packaging, and transport of low-level radioactive materials. Our revised response to the concerns of IE Bulletin 79-19 are addressed below. Please be aware that we have revised Items 1, 2, and 3 to reflect the recent reorganization of our management structure and that Item 4 has been changed to more accurately reflect the current status of the aforementioned procedures.

1. Official copies of the DOT and NRC regulations shall be maintained by the plants and the Nuclear Operations, Environmental and Radiation Control Group, Health Physics Unit. The Nuclear Operations, Environmental and Radiation Control Section, Health Physics Unit will be responsible for the preparation and updating of specific procedures to be used by the plants. Official copies of the pertinent regulations will be distributed by December 15, 1979.
2. Official copies of current requirements (license) placed on the waste burial form by the Agreement State shall be maintained by the plants and by the Nuclear Operations, Environmental and Radiation Control Section, Health Physics Unit. Official copies of the pertinent requirements will be distributed by December 15, 1979.
3. Those people in the plant organization who are responsible for the safe transfer, packaging, and transport of low-

level radioactive material are the General Manager, the Manager - Technical and Administrative, and the Environmental and Radiation Control Supervisor.

4. We will have management-approved, detailed instruction and operating procedures to be used by all personnel involved in the transfer, packaging, and transport of low-level radioactive materials by December 15, 1979.
5. Those Health Physics personnel involved in the transfer, packaging, or transport of radioactive waste have been trained or will be trained by December 15, 1979. Since frequent shipping activities maintain a constant familiarity with the current procedure, retraining will be given to those people involved in shipping when significant changes have been made in the procedure.
6. All personnel will be trained in those processes or portions of the process they participate in by December 15, 1979.
7. This is already covered in our Corporate Quality Assurance Program.
8. This audit has been or will be completed within the stated 60-day time frame.
9. As stated above, all additional actions on our part will be implemented by December 15, 1979. At no time will personnel who have not yet been fully trained be responsible for the transfer, packaging, or transport of radioactive waste.
10. Data requested for 1978 and the first six months of 1979:
  - (a) Question Nos. 1 and 2: This information is provided to the NRC in the Semiannual Effluent Accountability and Waste Disposal Reports for the time period in question.

- (b) Question No. 3: The answer is "YES". The H. B. Robinson Plant solidifies radioactive liquid waste in cement; the Brunswick Plant solidifies radioactive liquid waste in Urea-Formaldehyde (UF).

Yours very truly,



B. J. Furr  
Vice President  
Nuclear Operations

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