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 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261  
 50-324 Brunswick Steam Electric Plant, Unit 2, Carolina Power 05000324  
 50-325 Brunswick Steam Electric Plant, Unit 1, Carolina Power 05000325  
 AUTH. NAME: CUTTER, A.B. AUTHOR AFFILIATION: Carolina Power & Light Co.  
 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Describes util method for complying w/draft implementation guidelines for 10CFR61. Impell Corp WASTETRAK computer program will be utilized for waste classification.

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Carolina Power & Light Company

SERIAL: LAP-83-590

JAN 5 1984

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 AND 50-324  
LICENSE NOS. DPR-71 AND DPR-62  
10 CFR 61

Dear Mr. Eisenhut:

On November 30, 1983, draft implementation guidelines for 10 CFR 61 were agreed upon by the NRC and EEI's Utility Nuclear Waste Management Group (UNWMG) Low-Level Waste Task Force. Carolina Power & Light Company will comply with these guidelines in the following manner:

- Correlation factors will initially be based upon one set of analyses for the H. B. Robinson Plant and two sets of analyses for the Brunswick Steam Electric Plant.
- A contractor will continue to be utilized for solidification and dewatering services. The vendor process control program will be employed until an approved topical report is received. Historically, the process control program has resulted in acceptable freestanding monolithic products.
- Because of the large number of straightforward but tedious calculations required for waste classification and DOT package type determination, the Impell Corporation's WASTETRAK computer program will be utilized for waste classification.

If you should have any questions on this subject, please contact our licensing staff.

Yours very truly,

A. B. Cutter  
Vice President

Nuclear Engineering & Licensing

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