

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8601280177 DOC. DATE: 86/01/22 NOTARIZED: NO DOCKET #
 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH. NAME AUTHOR AFFILIATION
 ZIMMERMAN, S. R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Submits process control program establishing criteria & implementing controls re solidification of waste prior to disposal. Timely approval requested to support implementation during Feb 1986 refueling outage. Fee paid.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
 TITLE: DR Submittal: General Distribution

NOTES:

05000261

DL: 07/31/70

RECIPIENT		COPIES		RECIPIENT		COPIES	
ID	CODE/NAME	LTTR	ENCL	ID	CODE/NAME	LTTR	ENCL
PWR-A	ADTS	1	0	PWR-A	PD2 PD 01	5	5
PWR-A	EB	1	1	PWR-A	EICSB	1	1
PWR-A	FOB	1	1	REQUA, G		1	1
PWR-A	PSB	1	1	PWR-A	RSB	1	1
INTERNAL:	ACRS	09	6	6	ADM/LFMB	1	0
	ELD/HDS1		1	0	NRR/DHFT/TSCB	1	1
	NRR/DSRO/RRAB		1	1	NRR/ORAS	1	0
	REG FILE	04	1	1	RGN2	1	1
EXTERNAL:	24X		1	1	EG&G BRUSKE, S	1	1
	LPDR	03	1	1	NRC PDR	02	1
	NSIC	05	1	1			

W/check \$150
 #594892



Carolina Power & Light Company

JAN 22 1986

SERIAL: NLS-86-019

Director of Nuclear Reactor Regulation
Attention: Mr. Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of Licensing - A
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
PROCESS CONTROL PROGRAM
PROGRAM SUBMITTAL

Dear Mr. Rubenstein:

Carolina Power & Light Company (CP&L) hereby submits, for NRC approval, the proposed Process Control Program (PCP) for the H. B. Robinson Steam Electric Plant, Unit 2 (HBR2). This program will establish the requirements and implement controls upon the solidification of wastes prior to off-site disposal. Previous submittals of the PCP addressed the technical aspects of the solidification process and were intended to enable CP&L to perform the solidification process using in-house personnel, processes, and equipment. The Program presented herein is essentially administrative in nature since HBR2 has, for the present time, elected to contract the services of a "qualified" outside vendor to perform the solidification. This program established the administrative responsibilities and regulatory requirements to be imposed upon the contractor and CP&L. The Program is consistent with and very closely parallels the PCP previously approved for CP&L's Brunswick Steam Electric Plant.

HBR2 Technical Specification 6.15.1 requires NRC approval of the PCP prior to implementation. Therefore, CP&L requests that you expedite approval of this program in order to support implementation of the PCP during our next refueling outage, currently scheduled for February 1986. Carolina Power & Light Company is currently utilizing a qualified solidification contractor and operating in accordance with the administrative provisions of the proposed PCP pending formal NRC approval of the program.

Carolina Power and Light Company has reviewed this request in accordance with 10 CFR 170.12 and a check for \$150 in payment of the required fee is enclosed.

Yours very truly,

S. R. Zimmerman
Manager

Nuclear Licensing Section

MDM/cc (3231MDM)
Enclosure

cc: Dr. J. Nelson Grace (NRC-RII)
Mr. G. Requa (NRC)
Mr. H. Krug (NRC Resident Inspector - RNP)

Handwritten: A001 w/ check \$150 #594892

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

8601280177 860122
PDR ADDCK 05000261
PDR

CAROLINA POWER & LIGHT COMPANY

H. B. ROBINSON - UNIT 2

PROCESS CONTROL PROGRAM

H. B. ROBINSON
PROCESS CONTROL PROGRAM

1.0 SCOPE

This program establishes the management system and controls that the H. B. Robinson Steam Electric Plant (HBR) uses to ensure safe and effective solidification and dewatering of various low-level radioactive waste liquids and slurries for off-site disposal.

2.0 OBJECTIVES

It is the objective of this program that the solidification and/or dewatering of various low-level radioactive waste liquids and slurries (including oily wastes) for off-site disposal will be performed by qualified vendors. The quality of the solidified and/or dewatered product shall meet or exceed regulatory requirements and the disposal site criteria prior to release from the H. B. Robinson site for shallow land disposal.

3.0 MANAGEMENT PROGRAM

3.1 Responsibilities

3.1.1 The Plant General Manager is responsible for ensuring that waste is shipped in accordance with the appropriate state and federal regulations.

3.1.2 The Manager - E&RC is responsible for:

- a. Advising the general manager on the appropriate technical standards, regulations, and requirements as related to solidification, dewatering, and shipping.
- b. Ensuring the vendor's process control program, operating procedures, and proposed contractual agreements are reviewed and advising the general manager as to their adequacy.
- c. Retaining vendor-supplied documentation for NRC inspection and review.
- d. Ensuring vendor operations are monitored for compliance with:

- (1) Section 3.16.6.1 HBR Technical Specifications. The Solid Radwaste System shall be used in accordance with a process control program (PCP) to process wet radioactive waste to meet shipping and burial ground requirements.
- (2) Section 3.16.6.2 HBR Technical Specifications. With the provisions of the PCP not satisfied, suspend shipments of defectively processed or defectively packaged solid radioactive waste from the site.
- (3) Section 3.16.6.3 HBR Technical Specifications. If any test specimen, as required by the PCP, fails to verify solidification, the solidification of the batch under test shall be suspended until such time as additional test specimens can be obtained, alternative solidification parameters can be determined in accordance with the PCP, and a subsequent test verifies solidification. The PCP shall be modified as required in accordance with Section 6.15 of the technical specifications, and solidification of the batch may then be resumed using alternative solidification parameters as determined by the PCP.
- (4) Section 4.19.6.1 HBR Technical Specifications. The PCP shall be used to verify the solidification of one representative test specimen from every tenth batch of wet radioactive waste.

3.1.3 The Principal Specialist - Environmental of the Radiological & Chemical Support Section is responsible for advising the Manager - E&RC on:

- a. The appropriate technical standards, regulations, and requirements as related to solidification, dewatering, and shipping.
- b. The adequacy of the vendor's process control program, operating procedures, and proposed contractual agreements.

3.2 Specifications for Vendors

The qualified solidification vendor will:

- 3.2.1 Provide a * qualified process control program or a program approved by:
 - a. NRC
 - b. Disposal site licensee.

3.0 MANAGEMENT PROGRAM (Continued)

* NOTE

Qualified process control program has been interpreted to mean that testing of the product is underway (to meet the 10CFR Part 61 requirement) or test results have been transmitted to the Nuclear Regulatory Commission in the form of a topical report.

3.2.2 Demonstrate the ability to meet:

- a. NRC solidification standards.
- b. Disposal site specifications for solidified liquid wastes.
- c. NRC dewatering standards.
- d. Disposal site specification for freestanding liquids.
- e. DOT shipping regulations.
- f. CP&L radiation protection procedures and practices.

3.2.3 Provide documentation on the following for CP&L review, evaluation, and retention:

- a. Solidification and dewatering system design including a sketch of the processing system(s).
- b. Identification of solidification agent(s).
- c. Operating process control procedures with the process control parameters identified (including those for exothermic reactions required to be met prior to container's closure) and provisions to verify the absence of free liquids.
- d. Results of process test including:
 - (1) Identification of the representative sample of every tenth batch.
 - (2) Identification of actions taken if sample fails to verify solidification.
 - (3) Formulation used by the process.
- e. Topical or qualified report for dewatering.
- f. Topical or qualified report for high-integrity containers.

3.3 Program Operations

- 3.3.1 The vendor will dewater or solidify and package the supplied liquid wastes and slurries (including the oily wastes) according to vendor process control program.

MANAGEMENT PROGRAM (Continued)

- 3.3.2 The vendor will perform the tests described in the process control program.
- 3.3.3 The vendor will supply the Manager - E&RC with all documentation required to demonstrate compliance with dewatering and/or solidification requirements.
- 3.3.4 The Manager - E&RC will retain documentation required to demonstrate compliance with solidification requirements and standards.

4.0 MANAGEMENT/CONTRACTOR INTERACTIONS

- 4.1 The vendor is accountable to the Manager - E&RC for the solidification of liquid wastes.
- 4.2 The E&RC shipping foreman handles the shipping of solidification and dewatered wastes and maintains required documentation. The vendor and the E&RC shipping foreman may communicate on these matters as necessary.

5.0 ATTACHMENTS

- 5.1 None Applicable