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**AGNS**  
Allied-General Nuclear Services

September 21, 1979

U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N.W.  
Atlanta, Georgia 30303

Reference: RII:JPO  
50-332

Attention: Mr. J. P. O'Reilly  
Director, Region II

Gentlemen:

In response to your letter of August 10, 1979 concerning I. E. Bulletin No. 79-19, the following information is submitted for your consideration.

- 1) AGNS maintains a current set of the appropriate DOT and NRC Regulations concerning the transfer, packaging and transport of low-level radioactive waste material. Updates are received on a regular basis.
- 2) AGNS maintains a current set of requirements (license) placed on the waste burial firm by the Agreement State of South Carolina. If a special shipment to another burial facility is contemplated, the license requirements are obtained prior to shipment.
- 3) The established AGNS administrative and operating procedures designate the personnel responsible for the safe transfer, packaging and transport of low-level radioactive material.
- 4) The procedures noted in Item 3 have been reviewed and approved by appropriate levels of AGNS Management (review and approval cycles are procedurally established). Procedural content includes controls on the acceptable chemical and physical form of low-level radioactive waste, as well as instructions on ensuring container integrity. An additional procedure is being generated in this area and should be issued by November 1, 1979.
- 5) AGNS has had a training and retraining program in operation since 1974. One portion of that training and retraining program has been the review of DOT and NRC

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- 5) Continued - Regulatory requirements. To ensure that all personnel involved in the transfer, packaging and transport of radioactive material receive retraining, special training classes are to be held. Completion of this training requirement is estimated to be December 15, 1978. AGNS maintains a record of training dates, attendees, and subject material for future inspections by NRC personnel.
- 6) AGNS provides training and periodic retraining to those employees who operate the processes which generate waste to assure that the volume of low-level radioactive waste is minimized and that such waste is processed into acceptable chemical and physical form for transfer and shipment to a low-level radioactive waste burial facility.
- 7) AGNS has established and implemented a management-controlled audit function of all transfer, packaging and transport activities to provide assurance that personnel, instructions and procedures, and process and transport equipment are functioning to ensure safety and compliance with Regulatory requirements.
- 8) AGNS will perform, within 60 days of the date of this bulletin a management-controlled audit of its activities associated with the transfer, packaging and transport of low-level radioactive waste. AGNS will maintain a record of all audits for future inspections by NRC or DOT inspectors.
- 9) Pursuant to I. E. Bulletin No. 79-19, Item No. 9, the following responses are offered for your information:
  1. How many low-level radioactive waste shipments did you make? What was the volume of low-level radioactive waste shipped?

	<u>1978</u>	<u>1979</u>
Number of Shipments	26	13
Volume	6562 ft. <sup>3</sup>	5315.5 ft. <sup>3</sup>

2. What was the quantity (curies) of low-level radioactive waste shipped? What were the major isotopes in the low-level radioactive waste?

	<u>1978</u>	<u>1979</u>	<u>1978</u>	<u>1979</u>
33.555 Curies		.5 Curies	U <sup>238</sup>	U <sup>238</sup>

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9) Continued

3. Did you generate liquid low-level radioactive waste?  
If the answer is "yes", what process was used to  
solidify the liquid waste?

Liquid low-level radioactive waste was generated and  
prepared for shipment from two sources:

Process - U<sup>238</sup> waste, concentrated via evaporator  
and solidified with cement in drums.

Laboratory - Pu waste solidified using Urea-for-  
maldehyde or cement.

All records are available for review at the next NRC Inspection.

Very truly yours,

*for J. A. Buckham*  
R. C. Baxter  
President

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