



**Wisconsin Electric** POWER COMPANY  
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September 24, 1979

Mr. James G. Keppler, Director  
Office of Inspection and Enforcement  
Region III  
U. S. NUCLEAR REGULATORY COMMISSION  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301  
PACKAGING OF LOW-LEVEL RADIOACTIVE WASTE  
IE BULLETIN NO. 79-19  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

IE bulletin 79-19 discussed certain aspects of the rules and regulations governing the packaging of low-level radioactive wastes for transportation and burial at waste facilities. The Bulletin directed that certain actions be taken by all licensees to assure the safe transfer, packaging, and transport of low-level radioactive wastes. These actions and our specific responses, including, where applicable, our plan of action and schedule with regard to the Bulletin items, are presented below. The items are numbered to correspond to the numbered items of the Bulletin.

1. A current set of DOT and NRC regulations concerning the transfer, packaging, and transport of low-level radioactive waste materials is maintained in the Health Physics offices at our Point Beach Nuclear Plant.
2. Point Beach Nuclear Plant low-level radioactive wastes are presently being shipped to the licensed burial site at Barnwell, South Carolina. A copy of the State's burial site license, which includes a current set of requirements placed on the waste burial firm, is maintained at the plant. Should low-level radioactive waste shipments be made to other states, a current set of requirements for those states will be obtained before packaging low-level radioactive waste materials for transfer to that state.
3. The Radiochemical Engineer is designated as the individual responsible for the shipment and/or disposal of radioactive waste (other than nuclear fuel) in Point Beach Administrative Procedure 3.8.

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4. Management-approved instructions and procedures are presently in effect which provide administrative controls on the chemical and physical form of low-level radioactive materials and on the packaging integrity and preparations for shipping of low-level radioactive wastes. These instructions are contained in Plant Procedures OP-9B, "Solid Waste Processing", HP11.1, "Shipment and Receipt of Radioactive Material, General", HP11.12, "Radioactive Waste Shipment", and in several of the Chemistry and Health Physics and Operation Groups standing orders or instructions. The plant staff has prepared, and is in the process of obtaining management approval for, an extensive and detailed revision to HP Procedure 11.2 concerning shipment of radioactive materials. This revised procedure will provide further clarification and detailed instructions to assure the safe transfer, packaging, and transportation of low-level radioactive waste. It is anticipated that this procedure will be approved and in use by November 1, 1979.
5. Training in the instructions and operating procedures governing low-level radioactive waste shipments is provided as a part of the training lecture series administered to all new radiation helpers employed by Wisconsin Electric Power Company at the Point Beach Nuclear Plant. Records of this instruction are maintained. Additional training with emphasis on HP11.2 and specifically addressing the DOT, NRC and Agreement State regulatory requirements which affect low-level radioactive waste shipments at the Point Beach Nuclear Plant will be prepared and integrated in the health physics lecture series. This action will be completed by January 1, 1980. Periodic retraining in these subjects has been handled informally as a part of the regular Chemistry and Health Physics training sessions. In order to comply with this action item, periodic retraining in the subjects addressed in this Bulletin will be formally documented in the future and conducted on an annual basis.
6. Employees who presently operate the processes which generate waste have completed training on proper waste handling procedures and are aware of the acceptable chemical and physical forms necessary for transfer and shipment of low-level radioactive wastes. The processes which generate low-level radioactive wastes are maintained and operated in a manner which assures that the volume of low-level radioactive wastes is minimized. The past and present performance of Point Beach Nuclear Plant demonstrates that the volume of low-level waste shipped from the plant per unit of electrical generation is among the lowest in the power industry. Should additional means be developed to further economically minimize this volume, such means will be incorporated into the operating procedures of the plant as a matter of course. Additional training or retraining in this already prevailing philosophy of routine operation is not necessary.


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7 and 8 These Bulletin items direct the establishment, implementation, and performance of a management controlled audit function for all transfer, packaging and transport activities associated with the disposal of low-level radioactive wastes. This audit should provide additional assurance that personnel, instructions and procedures, and process and transportation equipment are functioning to ensure safety and compliance with regulatory requirements. Such an audit has been performed at the Point Beach Nuclear Plant in the past, although not on a regular basis.

Item 8 directs that an audit should take place within 60 days of the date of the Bulletin. We plan that an audit of these activities at the Point Beach Nuclear Plant will be conducted upon completion of the upcoming Point Beach Nuclear Plant Unit 1 refueling which will commence on October 5, 1979. As in the past, this audit will be conducted by personnel from our Nuclear Projects Office and will be independent of the plant staff. In view of the heavy demands on personnel during refuelings, we trust that the short delay in conducting the audit will be acceptable to you. Additional audits of these activities will be scheduled on a biannual basis or more often if necessary. Records of all audits, including those audits already completed, will be maintained.

The subject Bulletin also requests answers to three questions regarding radioactive waste shipments during 1978 and 1979. Questions 1 and 2 concerned the number, volume, and Curie quantity of low-level radioactive waste shipments. This information may be found in our Semiannual Monitoring Reports. Question 3 asks what process is used to solidify liquid low-level wastes. Point Beach Nuclear Plant uses a concrete forming process designed by Atcor for the solidification of liquid radioactive wastes and depleted ion exchange resins.

Very truly yours,

  
C. W. Fay, Director  
Nuclear Power Department

Copy to: Office of Inspection and Enforcement  
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