

## Omaha Public Power District

1623 HARNEY ■ OMAHA, NEBRASKA 68102 ■ TELEPHONE 536-4000 AREA CODE 402

September 21, 1979

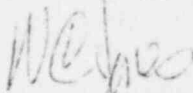
Mr. K. V. Seyfrit, Director  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011

Reference: Docket No. 50-285

Dear Mr. Seyfrit:

The Omaha Public Power District received IE Bulletin 79-19, dated August 10, 1979, requesting that certain actions be taken and documented relating to the packaging of low-level radioactive waste for transport and burial. Accordingly, the attached information responds to your request.

Sincerely,



W. C. Jones  
Division Manager  
Production Operations

WCJ/KJM/BJH:jmm

Attach.

cc: U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Division of Fuel Facility & Materials Safety Inspection  
Washington, D. C. 20555

LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N. W.  
Washington, D. C. 20036

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## ATTACHMENT

### Question 1.

Maintain a current set of DOT and NRC regulations concerning the transfer, packaging, and transport of low-level radioactive waste material.

### Response

The Omaha Public Power District maintains a current set of the Code of Federal Regulations, specifically Titles 10 and 49. The updated copies of these regulations are kept at the Fort Calhoun Station, as well as at the District's Production Operations headquarters at Jones Street Station.

### Question 2.

Maintain a current set of requirements (license) placed on the waste burial firm by the Agreement State of Nevada, South Carolina, or Washington before packaging low-level radioactive waste material for transfer and shipment to the Agreement State licensee. If a waste collection contractor is used, obtain the appropriate requirements from the contractor.

### Response

The District is using the services of Chem-Nuclear Systems, Inc. of Orchard Park, New York. All radioactive waste shipped out by Chem-Nuclear Systems, Inc. from Fort Calhoun Station is buried at Barnwell, South Carolina. The District maintains a copy of the procedures and requirements placed by Chem-Nuclear Systems, Inc. regarding shipments of radioactive waste.

### Question 3.

Designate, in writing, people in your organization who are responsible for the safe transfer, packaging, and transport of low-level radioactive material.

### Response

Standing Order T-4, "Waste Solids Shipment", is an administrative procedure of the Fort Calhoun Station Operating Manual. Persons who are responsible for the safe transfer, packaging, and transport of low-level radioactive material are designated, in writing, in Standing Order T-4. The Plant Health Physicist provides certification that all shipments are authorized for release. The Supervisor - Chemistry and Radiation Protection provides final review and approval prior to release from the site. In addition, the Radiation Protection Manual, Section 6.3, "Transportation of Radioactive Materials", and Health Physics Procedure HP-3, "Solid Waste Shipment Procedures", describe the responsibility of the Plant Manager, the Health Physics Technicians, the Shift Supervisor, and the Security Guard during the preparation of each waste shipment.

Question 4.

Provide management-approved detailed instructions and operating procedures to all personnel involved in the transfer, packaging, and transport of low-level radioactive material. Special attention should be given to controls on the chemical and physical form of the low-level radioactive material and on the containment integrity of the packaging.

Response

The "Solid Waste Shipment Procedures", HP-3, delineates all specific requirements for the shipment of the radioactive materials from the Fort Calhoun Station.

The procedure, HP-3, has been reviewed and approved by the Plant Review Committee and is incorporated in the Fort Calhoun Station Radiation Protection Manual. The "Solid Waste Shipment Procedures", along with Standing Order T-4, have been provided to all personnel involved in the transfer, packaging, and transport of low-level radioactive material.

Question 5.

Provide training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements, and in your instructions and operating procedures for all personnel involved in the transfer, packaging, and transport of radioactive material. Maintain a record of training dates, attendees, and subject material for future inspections by NRC personnel.

Response

All personnel involved in the transfer, packaging, and transport of radioactive material are scheduled for training prior to September 28, 1979. These persons include the General Maintenance and Health Physics Groups. Training will include a discussion of items III-1 through III-6, excluding III-5, of the attached Lesson Plan. Retraining will be conducted annually or when changes to any of the present requirements or procedures are issued, whichever is sooner.

Question 6.

Provide 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.

Response

All personnel who operate the processes which generate waste will be trained to assure that the volume of low-level radioactive waste is minimized and that such waste is processed into acceptable chemical and

Response (Continued)

physical form for transfer and shipment to a low-level radioactive waste burial facility. These persons will include Operations and Health Physics personnel. Training for these personnel will be completed prior to October 15, 1979, and will include a discussion of items III-1 through III-6 of the attached Lesson Plan. Retraining will be conducted annually or when changes to any of the present requirements or procedures are issued, whichever is sooner.

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Question 7.

Establish and implement 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.

Response

Quality Assurance Procedure #2, "Audit Plans", and Quality Assurance Procedure #16, "Internal Audit Cycle for QA Program", have been revised to require an annual audit by the Quality Assurance Department 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. The revised Quality Assurance Procedure #2 specifies that the audit plan shall verify "maintenance of a current set of DOT and NRC regulations, and requirements (license) placed on waste burial firm by the Agreement State; written designation of responsible personnel within OPPD; management-approved, detailed instructions and operating procedures; records of training and periodic retraining for both those involved in transfer, packaging, and transport and those involved in the processes which generate waste".

Question 8.

Perform, within 60 days of the date of this bulletin, a management-controlled audit of your activities associated with the transfer, packaging, and transport of low-level radioactive waste. Maintain a record of all audits for future inspections by NRC or DOT inspectors.

Response

See response to question 7. The audit plan has been issued and the audit is scheduled to be completed by September 28, 1979, by the Quality Assurance Department. Records of all Quality Assurance audits are maintained by the Corporate Quality Assurance Engineer.

Question 9.

Provide answers for 1978 and for the first six months of 1979 to the following questions:

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Question 9. (Continued)

1. How many low-level radioactive waste shipments did you make? What was the volume of low-level radioactive waste shipped?

(Power reactor licensees who report this information in accordance with Technical Specifications do not need to respond to this question.)

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

(Power reactor licensees who report this information in accordance with Technical Specifications do not need to respond to this question.)

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

Licensees who do not generate low-level radioactive waste should so indicate in their responses and do not need to take other actions specified in the above items.

Response

1. This information is reported to the Commission semi-annually in accordance with Section 5.9.4 of the Technical Specifications.
2. See 1. above.
3. Low-level liquid radioactive waste is generated at the Fort Calhoun Station and cement absorbent is used to solidify the liquid waste.

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## LESSON PLAN

I. Training Subject: Packaging of Low-Level Radioactive Waste for Transport and Burial

II. References:

1. NRC IE Bulletin 79-19, dated August 10, 1979.
2. DOT Regulations 49 CFR 170-179.
3. 10 CFR Parts 19 to 71.
4. 10 CFR Part 150.
5. Chem-Nuclear Systems letter #S-3009, dated July 31, 1979.
6. Chem-Nuclear Systems letter #N00-78-749, "Barnwell Site Disposal Criteria", dated December 15, 1978.
7. Chem-Nuclear Systems letter #SEQ-439, dated September 28, 1978.
8. Chem-Nuclear Systems, Radioactive Material License #097, Amendment #22, dated January, 1979.
9. Chem-Nuclear Systems letter #N00-79-487, dated May 29, 1979.
10. Standing Order T-4, "Waste Solids Release".
11. Radiation Protection Manual, Sections 6.3 to 6.7, "Transportation of Radioactive Material, Loading, and Shipment of Waste Drums".
12. HP-3, "Solids Waste Shipment Procedures".
13. OI-WDS-1, OI-WDL-2, OI-WDL-1, "Waste Processing and Solidification".

III. Instructions:

1. Discuss the requirements of reference 1.
2. Review guidelines and requirements of Barnwell burial site, references 5., 6., 7., 8., and 9.
3. Review the applicable sections of references 2., 3., and 4. pertaining to shipment of low-level radioactive waste.
4. Review the requirements of local procedures, references 10., 11., and 12.

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III. Instructions: (Continued)

5. Review reference 13., Operating Instruction.
6. Emphasize that no liquids are allowed in waste drums to be shipped.

IV. Summarize and Answer Questions

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