

110

October 24, 1979

Docket No. 50-346

License No. NPF-3

Serial No. 1-96



RICHARD P. CROUSE
Vice President
Energy Supply
(419) 259-5221

Mr. James G. Keppler
Regional Director, Region III
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Enclosed is our response to IE Bulletin 79-19.

Yours very truly,

RFC/TDM/DWB/daw

Enclosure

cc: Office of Inspection and Enforcement
Division of Fuel Facility and
Materials Safety Inspection
Washington, D.C. 20555

1323 124

OCT 26 1979

Q

7911130

105

Attachment to Toledo Edison Company Letter
Dated October 24, 1979 Serial No. 1-96
Response to IE Bulletin No. 79-19

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

RESPONSE

Current NRC regulations are maintained at the station. The station has a set of DOT regulations, however, it is not current. A purchase order was written in June 1978 to obtain current DOT regulations, but it was never received; these regulations were again ordered in October 1979.

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

A copy of Chem-Nuclear Systems, Inc. license from the South Carolina Department of Health and Environmental Control, Bureau of Radiological Health is on file at the station.

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

RESPONSE

Individuals responsible for the safe transfer, packaging and transport of low-level radioactive material are designated in writing.

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 following station procedures provide instructions for handling and shipping low-level radioactive material; AD 1850.02 (Solid Radioactive Waste Processing and Handling), HP 1607.01 (Shipping Radioactive Material), and SP 1104.28 (Solid Radioactive Waste Disposal).

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

The last class given on federal regulations for shipping radioactive materials was given on December 6, 1978. Training of this type is planned to be given on an annual basis.

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

Davis-Besse personnel involved in the processing of low-level radioactive waste will be trained and qualified on the system of equipment utilized to transfer waste or the equipment utilized to compact low-level waste for shipment. The training for operators will involve the use of qualification cards on redwaste systems with appropriate signatures to verify level of knowledge of system or equipment. Other station personnel, Station Service personnel, will be required to demonstrate proficiency in the operation of drumming equipment and records will be available to verify this proficiency. Verification of knowledge level of individuals will consist of signature of a Licensed Operator for Operations personnel; Station Service personnel will have their verification signed by a qualified Senior Station Service person. This program will be implemented by January, 1980.

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

The Quality Assurance Department has established program to audit activities relating to handling and shipping of radioactive materials.

1323 126

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

A radwaste management audit on activities associated with the transfer packaging and transport of low-level radioactive waste was conducted on October 17-23, 1979.

9. How many low-level radioactive waste shipments did you make? What was the volume of low-level radioactive waste shipped? (1978 and first six months of 1979)

RESPONSE

This information was provided in the semi-annual radioactive effluent reports for these periods as required by Technical Specifications.

10. What was the quantity (curies) of low-level radioactive waste shipped? What were the major isotopes in the low-level radioactive waste? (1978 and first six months of 1979)

RESPONSE

This information was provided in the semiannual radioactive effluent reports for these periods as required by Technical Specifications.

11. Did you generate liquid low-level radioactive waste? If the answer is 'yes', what process was used to solidify the liquid waste? (1978 and first six months of 1979)

Low-level radioactive waste was generated during these periods. Chem-Nuclear System, Inc., urea formaldehyde process was used to solidify liquid radwaste.

1323 127