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**Florida
Power**
CORPORATION

September 24, 1979

File: 3-0-3-a-4

Mr. J. P. O'Reilly
Director
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Suite 3100
101 Marietta Street
Atlanta, Ga 30303

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
I.E. Bulletin 79-19

Dear Mr. O'Reilly:

Enclosed is our response to Items 1 thru 9 of I.E. Bulletin 79-19.

Please contact this office if you require any additional discussion concerning our response.

Very truly yours,

FLORIDA POWER CORPORATION

W. P. Stewart

W. P. Stewart
Manager, Nuclear Operations

Tibbs (O'Reilly)D88

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

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IE BULLETIN 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 1. A current set of NRC and DOT regulations is maintained by the Chemistry and Radiation Protection Engineer.

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 2. Since all CR-3 waste is shipped to South Carolina a copy of the South Carolina agreement State License is maintained by Florida Power Corporation.

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

Response 3. Florida Power Corporation Administrative Instruction AI-200, Organization and Responsibility, designates the Chemistry and Radiation Protection Engineer as being responsible for assuring that radioactive material shipments conform with applicable NRC, DOT, and State regulations.

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 4. Florida Power Corp. procedure RP-209, Radioactive Waste Shipment Documentation, is being revised to reflect all listed requirements, Plant Review Committee approval is required prior to implementation. Revised RP-209 procedure will be in effect by November 1, 1979.

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 5. All personnel involved in the shipping of radioactive waste will have as a minimum eight (8) hours of classroom training in specified areas. Training records will be maintained.

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 6: Training and periodic retraining is administered to licensed and non-licensed personnel who operate radioactive waste process. Procedure RP-209, Radioactive Waste Shipment Documentation, control packaging and loading for offsite shipment.

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 7: Florida Power Corporation will implement its existing Quality Assurance Program (See Response to Item 8) for 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.

Our existing Quality Assurance Program (submitted as Amendment 52 to the Final Safety Analysis Report for Crystal River Unit 3, dated 5/9/77, and its Addendum 1, dated 5/20/77) satisfies 10 CFR 50 Appendix B and was approved by the Nuclear Regulatory Commission on 5/31/77.

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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. (Note: If you have an established audit function and have performed such an audit of all activities in Items 1-6 within the past six months, this audit requirement is satisfied).

Response 8 Audit QP-185 entitled "Rad Waste Transportation" will be conducted and a report issued prior to October 8, 1979. Audits on this subject will be conducted yearly thereafter.

9. Report, in writing within 45 days, your plan of action and schedule with regard to the above items. In addition, provide responses to the three questions below. Reports should be submitted to the Director of the appropriate NRC Regional Office and a copy should be forwarded to the NRC Office of Inspection and Enforcement, Division of Fuel Facility and Materials Safety Inspection, Washington, D.C. 20555.

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

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).

Response 9.1: Requested information was reported in the Crystal River Unit 3 Effluent and Waste Disposal Semiannual Report.

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).

Response 9.2: Requested information was reported in the Crystal River Unit 3 Effluent and Waste Disposal Semiannual Report.

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

Response 9.3: Yes, low-level radioactive liquid waste was generated. Waste was solidified using a vendor-supplied urea-formaldehyde process and system.

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