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POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



JOHN D. LEONARD, JR.
Resident Manager

September 12, 1979
JAFP-79-479

P.O. BOX 41
Lycoming, New York 13093

315-342-3840

Mr. Boyce H. Grier, Director
United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

SUBJECT: NRC I & E BULLETIN 79-19
PACKAGING OF LOW-LEVEL RADIOACTIVE WASTE
FOR TRANSPORT AND BURIAL

Dear Mr. Grier:

The FitzPatrick plant staff has completed its review of the subject bulletin and the results of that review are presented below in the same order as indicated in the bulletin.

1. A current set of Nuclear Regulatory Commission Regulations, concerning the transfer, packaging and transport of low-level radioactive waste are maintained. A set of Department of Transportation (DOT) regulations are maintained and kept current on an annual basis. The FitzPatrick plant will, within six months, obtain a complete set of the DOT regulations and will maintain these copies as current as practicable.
2. A current set of requirements (licenses) placed on the waste burial firms by the agreement states of South Carolina and Washington are maintained by the FitzPatrick facility.
3. The plant has designated in writing the personnel in the organization who are responsible for the safe transfer, packaging, and transport of low-level radioactive materials.
4. Management approved detailed instructions and operating procedures relating to the transfer, packaging and transport of low-level radioactive materials are currently provided to those personnel involved.
5. The FitzPatrick plant is conducting training in DOT and NRC regulations and the waste burial license requirements for site personnel involved in the transfer, packaging and transport of low-level radioactive material.

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This training applies to operators of radioactive waste treatment facilities, radiological and environmental services department supervisors and senior technicians and other site supervisory personnel with administrative responsibilities for the shipment of low-level radioactive material. In addition, training instructions will be amended to require initial training for replacement personnel and retraining at two-year intervals for appropriate personnel in these topics. The training department maintains records of training dates, attendees and subject matter for all training activities. Initial training and amendment of training instructions will be completed prior to December 31, 1979.

6. The FitzPatrick plant will conduct initial training for the radioactive waste treatment facility operators (hereafter referred to as operators) to assure that waste is processed into acceptable chemical and physical form for transfer and shipment to a low-level radioactive waste treatment burial facility. Training instructions will be amended to require initial training for replacement operators and retraining at two-year intervals for operators. Initial training and amendment of training instructions will be completed prior to December 31, 1979.

After low-level radioactive waste is transferred to the radioactive waste facility, operators have little control over the volume of such waste. In order to reduce the volume of low-level radioactive waste to the minimum practicable amount, the training curriculum for indoctrination of contractor and replacement personnel has historically emphasized the need for reducing the volume of material brought into contaminated areas. This philosophy originates at the management level and is communicated through supervisors and foremen who direct the work in contaminated areas.

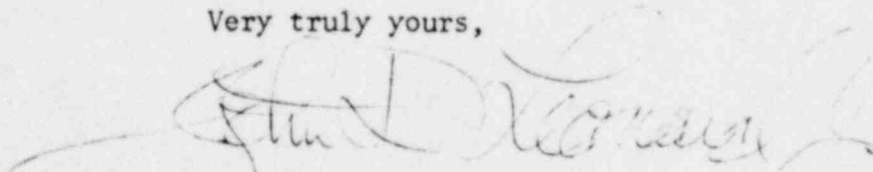
7. A management controlled audit function of transfer, packaging and transport activities is currently performed as required by 10 CFR 71 by the quality assurance department.
8. A management controlled audit was accomplished by the quality assurance department during the months of March and May of 1979. Future audits of the transfer, packaging and transport of low-level radioactive waste will be scheduled as required to fulfill remaining requirements of this bulletin which may not have been addressed in the original audits.

With respect to the three questions set forth at the end of the bulletin, answers to the first two questions are contained in the FitzPatrick Effluent and Waste Disposal Semi-Annual Report. In answer to question three, the FitzPatrick plant does generate liquid low-level radioactive waste. This waste is reduced in volume by plant operators utilizing permanently installed liquid waste evaporators and is later solidified using urea formaldehyde.

Very truly yours,

JDL:BSM:sw

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John D. Leonard, Jr.
Resident Manager

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