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BOSTON EDISON COMPANY
GENERAL OFFICES 800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

October 2, 1979

G. CARL ANDOBNINI
SUPERINTENDENT
NUCLEAR OPERATIONS DEPARTMENT

BECO. Ltr. #79-193

Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA. 19406

License No. DPR-35
Docket No. 50-293

Response to IE Bulletin #79-19

Dear Sir:

In a letter dated August 10, 1979, you transmitted IE Bulletin #79-19 titled, "Packaging of Low-Level Radioactive Waste For Transport and Burial". Boston Edison Company was requested to provide responses to the following items to assure that the safe transfer, packaging, and transport of low level radioactive waste is accomplished at Pilgrim Nuclear Power Station.

Item No. 1 Maintain a current set of DOT and NRC regulations concerning the transfer, packaging and transport of low level radioactive waste material.

Response

A current set of DOT and NRC regulations with by-weekly updates is maintained.

Item No. 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

All required licenses, certificate of compliances and collection contractor Quality Assurance Programs is maintained current.

Item No. 3 Designate, in writing, people in your organization who are responsible for the safe transfer, packaging and transport of low level radioactive material.

Response

The following personnel are responsible for the safe transfer, packaging and transport of low level radioactive material.

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- a. Sr. Waste Management Engineer - V. Stagliola
- b. Waste Management Engineer - R. Schuler

Item No. 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 low level radioactive material and on the containment integrity of the packaging.

Response

Detailed instructions are provided to all personnel involved in the transfer, packaging and transport of radioactive material.

Item No. 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 Waste Management Group currently provides periodic training in the area of radwaste processing and radioactive material transfer, packaging and transport.

Item No. 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

A program will be developed and instituted by October 1, 1980.

Item No. 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

Boston Edison Quality Assurance Department has an established auditing program in effect.

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Item No. 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 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

An audit has been scheduled to begin October 2, 1979.

Item No. 9 (1) How many low level radioactive waste shipments did you make? What was the volume of low level radioactive waste shipped?
(2) What was the quantity (curies) of low level radioactive waste shipped? What were the major isotopes in the low level radioactive waste?

Response (1) & (2)

This information is contained in our Semi-Annual Effluent Release Report (1.21).

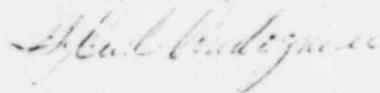
(3) Did you generate liquid low level radioactive waste? If the answer is "yes", what process was used to solidify the liquid waste?

Response (3)

"Yes", low level radioactive waste is generated at Pilgrim Station. Solidification is accomplished through the dewatering of spent resins and filter sludges.

We trust this information is responsive to your concerns; however, should you have any further questions on this subject please do not hesitate to contact us.

Very truly yours,



cc: Nuclear Regulatory Commission
Office of Inspection and Enforcement
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Washington, D. C. 20555

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