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September 24, 1979

Mr. Boyce H. Grier, Director  
Office of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
IE Bulletin No. 79-19

The purpose of this letter is to respond to directives set forth in IE Bulletin No. 79-19 which is concerned with the packaging of low-level radioactive waste for transport and burial. Our responses to the nine action items noted in Bulletin No. 79-19 are given below:

Item 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 Department of Transportation (49CFR) and Nuclear Regulatory Commission (10CFR) regulations concerning the transfer, packaging and transport of low-level radioactive waste material is maintained at the Oyster Creek Station.

Item 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 current set of requirements (license) placed on Chem Nuclear Systems, Inc. by the Agreement State of South Carolina is maintained at the Oyster Creek Station.

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Item 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 people in the Oyster Creek Station organization who are responsible for the safe transfer, packaging and transport of the low-level radioactive material have been designated in writing.

Item 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

Management-approved operating procedures which are used in operations and in the transfer of radioactive material within the radwaste facility are now provided. Procedures covering the packaging and the preparation for shipment of radioactive materials off-site are presently being prepared. These procedures will be management-approved and in use by October 31, 1979.

Item 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

Training and periodic retraining in the DOT and NRC regulatory requirements are presently provided to the health physics personnel. The present operations training program provides training and retraining on minimizing radioactive waste by those processes which generate wastes. A training program is presently being developed for the new radwaste facility which will cover radwaste operations including transfer, packaging and shipping of radioactive material and the DOT, NRC and waste burial requirements thereto. The new radwaste facility training program will be in full use by December 31, 1979.

Item 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

See response to Item 5.

Item 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

A management-controlled audit function for the transfer, packaging and transport of radioactive materials has been established and is being implemented. This function is provided by the Generation Division Quality Assurance Department.

Item 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

A management controlled audit of radwaste operations was conducted on March 7, 1979 (Audit No. 79-04).

Item 9

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

- i. 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?

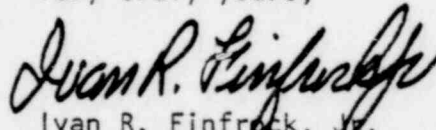
(Power reactor licensees who report this information in accordance with Technical Specifications do not need to respond to this question.)

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

Response

1. Reported in Semiannual Reports 78-1, 78-2 and 79-1, "Radioactive Effluent Releases".
2. Same as No. 1 above.
3. Liquid low-level radioactive wastes were generated. A process using urea formaldehyde is presently used to solidify filter sludge and evaporator bottoms.

Very truly yours,

  
Ivan R. Finfrock, Jr.  
Vice President

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cc: United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Division of Fuel Facility and Materials Safety Inspection  
Washington, DC 20555

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