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VICE PRESIDENT  
ELECTRIC PRODUCTION

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September 28, 1979

Re: Docket Nos.: 50-277  
50-278

POOR ORIGINAL

IE Bulletin 79-19

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

Dear Mr. Grier:

This letter is in response to IE Bulletin 79-19, received on August 14, 1979, concerning packaging of low-level radioactive waste for transport and burial. Responses to your questions are presented sequentially.

Action To Be Taken By Licensees

To assure the safe transfer, packaging, and transport of low-level radioactive waste, each licensee is expected to:

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

Response

A set of DOT and NRC regulations is kept current through a subscription to the Federal Register addressed to the Station Superintendent.

To further ensure that our set of regulations are current, the following additional actions have been taken:

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- a) A purchase order has been issued to obtain the most current copies of 10 CFR parts 0 to 199 and 49 CFR parts 100 to 199 from the U.S. Printing Office as they are made available. The addressee for these materials is the person who is Technical Assistant of Health Physics Support Service.
  - b) A purchase order has been issued to Datamation Corporation to purchase their subscription service which provides updates of the rules and regulations pertaining to the packaging, handling and shipping of radioactive materials. The addressee for these materials is the person who is the Engineer - Health Physics.
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

We do possess a current set of Requirements for the burial sites in South Carolina and Nevada. At the present time, no shipments are made to the burial site in the state of Washington. If shipment to the burial site in the state of Washington is required, we will obtain a current set of their Requirements and will incorporate them into our procedures prior to shipment.

In order to insure a current set of Requirements, the Engineer-Chemistry is on the Chem-Nuclear and NECO (operators of the burial sites in South Carolina and Nevada) mailing list which provides updates to the state regulations and vendor licenses as changes are made to them.

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

Response

We are writing a plant procedure to designate individuals by job title or group responsible for the safe transfer, packaging and transport of low-level radioactive material.

Three individuals (or group of individuals) have responsibility for the safe transfer, packaging and transport of low-level radioactive material at the Peach Bottom Atomic Power Plant Site.

These three individuals (or group of individuals) and a brief description of their responsibilities are outlined below:

#### Shift Supervision

Shift Supervision is responsible for the operation of systems and processes which generate, transfer and package low-level radioactive waste (dewatered resin, trash, etc.). A member of this group, the Radwaste Supervisor (or his alternate), is directly responsible for packaging and transport of Radioactive Waste for off-site disposal.

#### Engineer - Health Physics

The Engineer of Health Physics is responsible for the safe handling, transport and storage of radioactive material within the Peach Bottom Site. He is also responsible for the transfer, packaging and transport off-site of low-level radioactive material other than radioactive waste. Radioactive waste is radioactive material which is transported to a burial site for disposal. Radioactive material includes radioactive sources and contaminated equipment shipped to other sites for re-use. He is responsible for maintaining the records of radioactive material shipments other than radioactive waste. He also acts as a technical advisor to the Radwaste Supervisor.

#### Engineer - Chemistry

The Engineer of Chemistry is responsible for maintaining the records of radioactive waste shipments. He provides the audit function on radioactive waste shipments. He also acts as a technical advisor to the Radwaste Supervisor.

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

All plant operating procedures which involve the transfer, packaging and transport of low-level radioactive waste have been reviewed and revised as necessary in order to insure compliance with NRC, DOT, and Burial site requirements. Special attention is given to the chemical and physical forms of the low-level material and to the containment integrity of the packaging. These revisions have been approved by the Plant Operation Review

Committee. In response to the recent industry concern over proper handling of low-level radioactive material, the Operation and Safety Review Committee is being requested to also review and approve the applicable procedures.

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

Plant personnel directly responsible for transfer, packaging and transport of radioactive waste have been trained in DOT, NRC and Burial Site requirements and the operating procedures which enforce these requirements. The remainder of shift supervision and the plant operating force which transfer, package and transport radioactive material will be trained in DOT, NRC and Burial Site requirements and the operating procedures to the depth necessary for the job they perform. This training will be completed by January 1, 1980. Retraining will be performed 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

All plant personnel as part of their normal training (General Employee Training and job specific training) are instructed to minimize the volume of radioactive waste produced. In order to stress the importance of minimizing radioactive waste, and of acceptable chemical and physical form for transfer and shipment of low-level radioactive waste, all plant operators who transfer and package radioactive waste will receive additional training in these areas by January 1, 1980. Retraining will be performed on an annual basis.

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 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 was established and implemented in accordance with the April 1978 revision to the Peach Bottom Quality Assurance Plan (PBQAP) Operations Phase. This revision of the PBQAP incorporated the applicable criteria contained in 10 CFR 71 Appendix E "Quality Assurance Criteria for Shipping Packages for Radioactive Material".

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

An audit covering all areas except training was conducted in January 1979. In keeping with your "within the past 6 months" requirement for performance of an audit covering all activities in Items 1-6, a Quality Assurance Division audit is in progress and will be completed by October 10, 1979.

#### Additional Questions

1. How many low-level radioactive waste shipments did you make? What was the volume of low-level radioactive waste shipped?

#### Response

In accordance with the instructions in Bulletin 79-19, no response to this question is necessary since the number of waste shipments and the volume of waste is reported in accordance with Technical Specifications in our Semi-Annual Effluent Releases Report.

2. What was the quantity (curies) of low-level radioactive waste shipped? What were the major isotopes in the low-level radioactive waste?

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Response

In accordance with the instructions in Bulletin 79-19, no report of the quantity (curies) of radioactive waste is included since it is reported in accordance with the Technical Specifications in our Semi-Annual Effluent Releases Report. The major isotopes in the low-level radioactive waste from Peach Bottom Atomic Power Station are: Na-24, P-32, Fe-55, Cr-51, Mn-54, Co-58, Co-60, Zn-65, Sr-89, Sr-90, Zr-95, Nb-95, Tc-99m, Mo-99, I-131, I-133, Cs-134, Cs-137, Ba-140, La-140.

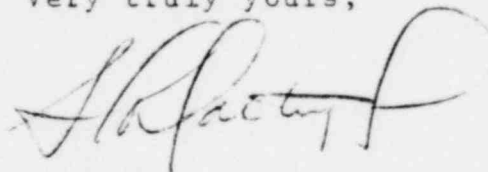
3. Did you generate liquid low-level radioactive waste? If the answer is 'yes', what process was used to solidify the liquid waste?

Response

We do generate liquid low-level radioactive waste in the form of contaminated oils. These oils are solidified using the Delaware Custom Material process which uses cement with additives.

Should you have need for any further information, please feel free to contact us.

Very truly yours,



cc: United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Division of Reactor Operations Inspection  
Washington, DC 20555

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