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September 28, 1979

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Mr. K. V. Seyfrit, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Comm.
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Arkansas Nuclear One-Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to IE Bulletin No. 79-19
(File: 1510.1 and 2-1510.1)

Gentlemen:

In response to the corresponding items of the subject bulletin, the following is provided:

- Item 1. A current set of DOT and NRC regulations concerning the transfer, packaging and transport of low-level radioactive waste material is maintained at Arkansas Nuclear One. These regulations are readily available to responsible personnel.
- Item 2. We have maintained at Arkansas Nuclear One a current set of requirements placed on the Barnwell facility by the Agreement State of South Carolina prior to shipments to Barnwell. Even though other facilities are not currently used, the States of Nevada and Washington will be contacted to obtain a current set of their regulations.
- Item 3. Although no individual has previously been designated in writing, the Health Physics Supervisor at Arkansas Nuclear One has been responsible in the past for the safe transfer, packaging and transport of low-level radioactive material. We will assure that a person is designated in writing by October 15, 1979 to perform these tasks.

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- Item 4. Procedures are provided at Arkansas Nuclear One to ensure proper packaging, loading, marking and shipping of low-level radioactive waste in compliance with DOT and NRC regulations. A plan for implementation of the recommendations of the audit required in Item 8, IE Bulletin 79-19, will be provided by December 1, 1979.
- Item 5. A plan for implementation of a training and periodic retraining program in the DOT and NRC regulatory requirements, the waste burial license requirements, and in our instructions and operating procedures will be provided by December 1, 1979.
- Item 6. A plan for implementation of a training and periodic retraining program for those employees who operate the processes which generate waste will be provided by December 1, 1979.
- Item 7. A management-controlled audit will be performed as necessary, but a minimum of once a year, 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.
- Item 8. A management controlled audit of our activities associated with the transfer, packaging and transport of low-level radioactive waste has been performed. A record of all audits will be maintained for future inspection by NRC or DOT inspectors.

Following a review of recommendations from the audit required by IE Bulletin 79-19, Item 8, a plan of action for Items 4, 5 and 6 will be provided by December 1, 1979.

The following is provided to answer the questions asked on page 3 of IE Bulletin 79-19 for 1978 and the first six months of 1979:

1. For 1978, 26 shipments of low-level radioactive wastes were made. This consisted of approximately 7850 cubic feet. For the first six months of 1979, 10 shipments of low-level radioactive waste were made. This consisted of approximately 5041 cubic feet.
2. For 1978, approximately 460 curies of low-level radioactive waste were shipped. For the first six months of 1979, approximately 750 curies of low-level radioactive waste were shipped. The major isotopes in the low-level radioactive waste included:

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Cr - 51	Nb - 95	Sb - 125
Mn - 54	I - 131	Cu - 51
Mn - 56	Cs - 134	Sr - 90
Fe - 59	Cs - 137	
Co - 58	Cs - 138	
Co - 60	H - 3	
Co - 57	Ag - 3	
Cr - 95	Sb - 122	

3. Liquid radioactive waste was generated. No liquid radioactive waste was solidified or shipped, but was processed, treated, and released in accordance with Technical Specification limits.

Very truly yours,

David C. Trimble

David C. Trimble
Manager, Licensing

DCT/MAS/ew

cc: Mr. W. D. Johnson
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