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July 8, 1981

W3P81-1633
3-G21

Mr. R.L. Tedesco
Assistant Director for Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Waterford 3 SES
Docket No. 50-382
Effluent Treatment Systems Branch -
Waste Handling Concerns



Dear Mr. Tedesco:

In a follow-up to the telephone conversation between our respective staff members on Thursday, June 25, I would like to reiterate the salient points of our discussion related to the potential open items of the Effluent Treatment Systems Branch. These items are as follows:

1. Location of Solid Radwaste System control panel
 2. Onsite storage capacity for solid radwaste
 3. Location of waste compactor
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1. Location of Solid Radwaste System control panel

The primary areas of NRC's concern with this panel would appear to be twofold, namely the proximity of the panel to the waste compactor and the inability of the waste system operator to observe the solidification processing equipment. The former concern will be addressed in the discussion of the waste compactor location. In order to provide for operator observation of the solidification process, the relocation of the control panel to a position approximately 10 feet west and 90 degrees from the present panel location was evaluated. Such a location would prove to be unsatisfactory for several reasons.

- a. The radwaste demineralizers, some of which are directly below the drumming station on the -4' elevation, are designed to be gravity filled. The proposed panel location would place the panel directly atop the fill plugs in the floor of the drumming station, thus prohibiting resin addition to these two demineralizers as presently designed.

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- b. In addition to the two resin fill plugs mentioned above, two others are located in the floor immediately behind the wall by which the present panel is located. In order to access these fill plugs, the portable resin addition tank must be moved around that wall. If the panel were to be moved to the proposed location, the resin addition tank could not be moved through the opening left between the control panel and the end of the wall.
- c. The resin addition tank is not the only piece of equipment which must pass through this opening. The filter transfer cask, which will be used to remove highly radioactive filters, will be placed on a filter transport vehicle to move the cask from the lower elevations of the auxiliary building up to the drumming station. Once in the drumming station, the vehicle would then move past the control panel and wall to a position where the filter can be placed inside a liner and shield. If the control panel were moved to the proposed location, the vehicle would be unable to maneuver between the wall and panel.

Based upon all of the above, we feel that the control panel must remain in its present location. However, we have evaluated other alternatives which would provide the operator with a capability to observe the radwaste processing equipment. It is our intention to install a closed circuit television camera and remote monitor. Such a system would furnish the operator with the capability he requires and should serve to satisfy any concerns with this item.

2. Onsite storage capacity for solid radwaste

The primary area of NRC's concern with this item would appear to be the shortage of space designated for onsite storage of solid radwaste which is awaiting disposal. We have evaluated our storage capability and have decided to construct an onsite storage facility. Such a facility will provide adequate storage capability to accommodate variations in the rate of generation of waste as well as disposal site availability. We are currently evaluating two alternatives for supplying the recommended storage facility. One is to modify an existing warehouse, the second is to construct a completely new facility. If modification to the warehouse is feasible, we feel that this can be accomplished in time to support receipt of an operating license. If modification to the warehouse is not feasible, construction of a new facility could not be completed prior to issue of an OL. We feel certain, however, that such a structure could be completed by the time of the first refueling outage. With either alternative, the need to store large volumes of radwaste within the auxiliary building will be eliminated.

3. Location of waste compactor

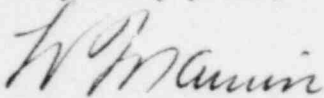
The apparent concerns with the location of the waste compactor are its proximity to the solidification system control panel and the shortage of space available for the holding of compressible waste prior to

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compaction. With the decision to provide an onsite storage facility as discussed above, the space in the drumming station indicated as "liner storage area" will not be needed for storage of waste. We therefore propose that the waste compactor be relocated to the area previously designed for liner storage. This area will furnish more than adequate space for all activities related to the handling of compressible waste.

We have received preliminary indication from ETSB that the commitments discussed above would eliminate any potential open items on their part concerning the solid waste handling area.

Very truly yours,



L.V. Maurin
Assistant Vice President -
Nuclear Operations

LVM/RWK:dc

cc: E.L. Blake, W.M. Stevenson