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May 21, 1982

ØCANØ48222

Mr. R. Dale Smith, Chief
Low-Level Waste Licensing Branch
Division of Waste Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License No. DPR-51 and NPF-6
AP&L Comments on NRC's Draft Branch
Technical Position on Radioactive
Waste Classification
(File: 1510, 2-1510)

Gentlemen:

The purpose of this letter is to respond to your March 31, 1982, letter which requested our comments on the subject Branch Technical Position (BTP) paper. We agree with your assessment that the preliminary draft BTP needs additional work and are happy to provide you with the enclosed comments for your consideration in the development of later drafts of the BTP.

We appreciate the opportunity to be a part of your early review and comment efforts and believe as you do that these efforts will contribute to making the final programs more workable and practical for those who will be implementing them. We look forward to reviewing any later versions of the BTP when distributed for comment.

Very truly yours,

John R. Marshall

John R. Marshall
Manager, Licensing

JRM:DT:sc

Enclosure

Attachment to ØCANØ48222

AP&L's Comments on NRC's Draft Branch
Technical Position on Radwaste Classification
(Reference: NRC Letter Dated March 31, 1982)

General Comments:

1. The preliminary Branch Technical Position (BTP) does not specifically address dry active wastes (compactable or noncompactable) or filters. We are unclear as to how these wastes are to be considered, what constitutes a representative sample, and whether the intent is to analyze each filter in a given stream or a composite of filters. The next draft BTP needs to be more specific in these areas as a prerequisite for any proposed program to be practicable and implementable.

2. The qualitative analysis implications need to be explained as they relate to the management of 10CFR61 Table 1 pure beta emitters. There needs to be defined a specific methodology acceptable to demonstrate compliance with Table 1.

3. Acceptable analytical techniques need to be prescribed for chelating agents. Also, the term "significant quantity" needs to be defined in quantitative terms.

4. To avoid conflicting regulations, the NRC proposed requirements relating to shipping manifests must be consistent with the joint EPA/DOT shipping manifest 40CFR Parts 260 and 262. If the hazardous waste also happens to be radioactive, we are unclear as to which regulation, shipping manifest, etc. should take precedence.

5. Concerning Appendix A, we are unsure as to what specifically is considered to be a waste stream subsystem. We feel that there may be unacceptable ALARA ramifications associated with the sampling (including multiple samples) of high activity resins.

6. At present, we feel that the scopes of 10CFR61 and the BTP are beyond the routine capability and practicality of nuclear power plant operation. In particular, we do not feel the BTP programs as presently described are cost-effective in considering plant-specific resources and ALARA (exposure controls). As such, there needs to be defined which specific changes in plant operations (within tolerance ranges) would require reanalyses. Also, proper consideration needs to be given in all future revisions to the BTP to assure that better control of waste is indeed achieved.

7. We question whether the programs are realistic, practical, reasonable or implementable as presently described in the preliminary draft BTP. The programs need to be described in more quantitative terms in the next draft of the BTP so that more meaningful comments may be submitted for the purpose of assuring that the programs are workable and practicable.

Specific Comments: Further clarification is needed on all of the following items.

(A) Page 2. Footnote 1. Specific guidance needs to be included on when a chemical analysis would be required for a hazardous waste.

Footnote 2. There needs to be included a definition of the "Significant part of the total radioactivity."

(B) Page 4. In some cases, specifically low-level radionuclides (e.g., Sr-90), a factor of 10 may not be within the detection capability of available detection systems.

We feel this factor should be reduced as a matter of practicality.

(C) Page 6. In Table 1, we are unclear as to whether or not 10 nanocuries/gram is to be considered a DeMinimus level; for example, it is unclear as to whether less than 10 nanocuries/gram is intended to be considered a class "C" waste. We are unsure as to how specific radionuclide concentrations are to be determined with a variety of waste types, nonhomogeneous mixtures, compacted trash or LSA boxes, pipe, clothes, steel, etc. We are also unsure as to how gross radioactivity measurements are to be meaningfully related to and thereby characteristically indicative of a given radionuclide distribution.

(D) Page 7. It is stated that the frequency of confirmatory analysis should increase with increasing radionuclide concentrations. This statement needs to be clarified as to what is intended. We are unclear as to whether batch sample resin would constitute an acceptable representative sample. The following terms need to be defined: " Routinely, minor process variations, upward change, reasonable possibility, allowable concentrations, periodically, correlation of measurements, whenever there is reason to believe, significantly altered, and facility or process changes." Conceptual and qualitative terminology should be made more quantitative and implementable when future draft BTPs are published for comment. In general, sampling frequency requirements are inconsistent with the ALARA program.

(E) Page 8. We are unsure as to how we can assure that a "representative sample of trash" has been selected for testing.

(F) Page 9. We are unclear as to the techniques and criteria for determining which radionuclides contribute significantly to the total activity. Quantitatively speaking, we are unsure as to what is meant by the term "significant".