

RSA

CORPORATION

U.S. HIGHWAY 46 AND SCHLEY STREET DOVER, NEW JERSEY 07801

201-361-0583

November 27, 1979

Director, Region I
Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Subject: IE Bulletin No.79-19

POOR ORIGINAL

Dear Sir:

As a licensee we do generate a small volume of low level radioactive waste in solid form and therefore do come under the requirements of the subject bulletin. However, the amounts we generate are so small that it is difficult to follow your items point by point. We generate approximately one drum of dry solid waste per year in the form of dry filter cartridges and paper. We have made no shipments in 1978 or 1979 and do not expect to ship until late 1980 or early 1981.

We do have what we believe to be a current set of DOT and NRC regulations. When we do ship it will be via a licensed collection contractor who will select the burial site (if any are operating). At that time we will obtain through the contractor the then current requirements for the burial site selected.

There appears to us to be little value in training and retraining on requirements which may well be obsolete when it comes time to ship, or to do a management audit on a zero activity. I should point out that at present all of our "operating" people are professionals and considered management. So our "plan of action and schedule" is to review the requirements at the middle or end of 1980 and see what options are open to us at that time. In the meantime the person chiefly responsible for packaging and shipping when the time comes is the writer.

Sincerely,

E.T. Sullivan

E.T. O'Sullivan
Vice President

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cc: NRC Office of Inspection and Enforcement
Division of Fuel Facility and Materials Safety Inspection
Washington, D.C. 20555

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