

PHILADELPHIA ELECTRIC COMPANY

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M. J. COONEY
MANAGER
NUCLEAR PRODUCTION
ELECTRIC PRODUCTION DEPARTMENT

May 23, 1985

Docket No. 50-352

Mr. Thomas T. Martin, Director
Division of Radiation Safety and Safeguards
Region 1
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter dated May 2, 1985, forwarded Inspection Report 50-352/85-21 for Limerick Generating Station Unit 1 in which no violations were identified. However, you requested that we describe in writing our readiness plans concerning our radioactive waste management program and state that no radioactive waste shipments will be made until the radioactive waste management program is in place and meets the requirements of IE Bulletin 79-19.

We are in the process of finalizing our radioactive waste management program. Until such time that this program is in place and meets the requirements of IE Bulletin 79-19, no radioactive waste shipments will be made from the Limerick Generating Station. Restated below are the requirements set forth in IE Bulletin 79-19 followed by our response.

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 Manager Limerick Generating Station.

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To further ensure that our set of regulations are current, the following actions have been or will be taken prior to any radioactive waste shipment from Limerick Generating Station.

- a) A current copy of 10 CFR and all revisions are sent to the Plant Manager through a subscription service and are available in the Health Physics office.
 - b) A purchase order will be issued by 06/15/85 for a subscription service for other documents, i.e. 49 CFR which will provide up-dates of the rules and regulations pertaining to the packaging, handling and transport of radioactive waste.
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

To ensure that the requirements and licenses are kept current, Philadelphia Electric Company's Director of Radiation Protection in the corporate office is on the mailing lists of the burial sites in South Carolina and Washington which provide updates to the state regulations and vendor licenses as changes are made to them. Copies of these are maintained both at Headquarters and at the Limerick Generating Station in the Health Physics office. Prior to the shipment of radioactive waste, verification will be made to assure that we possess current requirements and licenses.

If a waste collection contractor is used, its requirements will be incorporated into our procedures.

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 have developed written position descriptions to designate individuals by job title who are responsible for the safe transfer, packaging and transport of low-level radioactive material.

A management organization has been developed to provide safe transfer, packaging, and transport of radioactive materials. The Operations Engineer has overall responsibility for directing the safe transfer, packaging and transport of low-level radioactive material. The senior plant staff members

from Health Physics (Senior Health Physicist) and Chemistry (Senior Chemist) provide dedicated qualified personnel and software to support radwaste operations.

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

Plant operating procedures involving the transfer, packaging and transport of low-level radioactive waste have been approved by the Plant Operation Review Committee (PORC). Revisions as necessary, to maintain compliance with the applicable NRC, DOT and site specific burial requirements will be provided. Special attention is being given to the chemical and physical form of the low-level material and the containment integrity of the packaging. Revisions will also be reviewed by PORC.

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 involved in the collection, packaging, and transfer of radioactive low-level waste are trained in DOT, NRC, specific burial site requirements and operating procedures pertinent to its safe transportation and storage.

Those individuals who have supervisory accountability and responsibility for shipment of low-level waste attend a formal classroom training initially and for annual requalification with emphasis in the following areas:

- Regulatory agencies
- Commercial Site Disposal Criteria
- Waste Classification System
- DOT Classification
- Packaging Criteria
- Marking and Labeling
- Staging
- Pre/Post Loading Survey

Those people who will play a lesser roll, i.e. the collection, sorting and gathering, and temporary storage of low-level radioactive material attend a formal classroom training initially and for annual requalification with special emphasis given on the controls of chemical and physical forms.

All plant employees as part of their normal training (General Employee Training and job specific training) are instructed in methods to minimize the volume of radioactive waste produced. Retraining is performed on an annual basis.

A record of attendees, training dates and subject material discussed is maintained for inspection by NRC personnel.

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

Plant employees, as part of their normal training (General Employee Training and job specific training) are instructed to minimize the volume of radioactive waste produced. System training is currently being developed for Operators as to the specific operations of three general areas.

Plant personnel in Solid Radwaste, Offgas, and Liquid Radwaste operations have been trained and the formalized requalification programs for these areas will be completed and implemented by September 1, 1985.

To stress the importance of radwaste volume reduction and of acceptable chemical and physical form for transfer and shipment of low-level radioactive waste, specific personnel whose job encompasses the collection, transfer and packaging of radioactive waste will receive additional training in these areas.

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 has been developed as an integral part of the overall Quality Assurance program. The audit function performed by the PECO Quality Assurance Organization assures and documents that personnel, instructions, procedures and process are in compliance with current Regulatory requirements.

To ensure the independence of the audit and the auditor, the Quality Assurance organization does not report to the Plant Operations organization.

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

The requirements of IE Bulletin 79-19 were not applicable to Limerick Generating Station during the 60 day time period following the date of the Bulletin. However, a management-controlled audit will be performed prior to the first waste shipment from Limerick Generating Station. Audit records will be on file for review by NRC or DOT inspectors.

Additional questions asked in IE Bulletin 79-19:

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

Response

No low-level radioactive waste shipments have been made. Low-level radioactive material generated, (spent resins, DAW), are being stored on site pending completion of the Radioactive Waste Management program.

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

Not applicable.

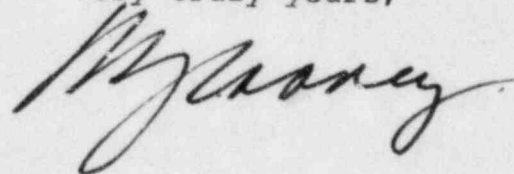
3. Did you generate liquid low-level radioactive waste? If the answer is 'yes', what process was used to solidify the liquid waste?

Response

No low-level radioactive liquid waste has been generated to date.

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

Very truly yours,

A handwritten signature in cursive script, likely belonging to J. T. Wiggins, the Resident Site Inspector mentioned in the distribution list.

cc: J. T. Wiggins, Resident Site Inspector
See Service List

c: Judge Helen F. Hoyt
Judge Jerry Harbour
Judge Richard F. Cole
Troy B. Conner, Jr., Esq.
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Mr. Robert L. Anthony
Ms. Phyllis Zitner
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Jay M. Gutierrez, Esq.
Atomic Safety & Licensing Appeal Board
Atomic Safety & Licensing Board Panel
Docket & Service Section (3 Copies)
James Wiggins
Timothy R. S. Campbell

January 16, 1985