

3.0 SURVEILLANCE REQUIREMENTS

3.12 Radiological Waste Sampling and Monitoring (Continued)

3.12.2 Solid Radioactive Waste

Applicability

Applies to the sampling, testing, and analysis of the wet radioactive waste.

Objective

To ensure that the solid radioactive wastes meet the limits specified in Section 2.9.2 of these Specifications.

Specifications

- (1) The Process Control Program (PCP) shall be used to verify the solidification of at least one representative test specimen (drum) from at least every twelfth batch of wet radioactive waste (e.g., evaporator concentrates).
 - A. If any test specimen fails to verify solidification, the following actions shall be taken:
 - (i) Verify solidification of all other drums from the batch under test.
 - (ii) Review the adequacy of the solidification parameters defined in the PCP and develop/verify alternative solidification parameters, if required, in accordance with the PCP.

In the event the solidification parameters are altered:

- (a) Select one representative drum from each consecutive batch to verify solidification until at least 3 consecutive drums verify solidification. The surveillance schedule defined in Specification 3.12.2(1), above, may be resumed after 3 consecutive drums verify solidification.
- (b) Modify the PCP as required and report the changes to the NRC in accordance with Specification 5.9.4.a.

Basis

This specification was developed to ensure the requirements of 10 CFR Parts 20 and 71 for solid radioactive waste are met. The purpose of placing wet radioactive wastes in a solid, dry form is to limit dispersion of radioactive material to the environs in the event of failure of a disposal container (drum) before, during or after disposal. These requirements provide periodic documentation that solidified wet radioactive waste materials are in suitable form for transportation and disposal.

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Discussion, Justification and Significant Hazards Consideration

Discussion

The surveillance requirements which will be established by proposed Technical Specification 3.12.2 will ensure that solidified wet radioactive waste materials meet the requirements of 10 CFR Parts 20, 50 and 71 and are in an acceptable form for transportation and disposal. These surveillance requirements and the referenced Process Control Program (PCP) provide for documented inspections of representative test specimens (drums) approximately every six (6) months. In the event complete solidification does not occur, this specification provides for inspection of other drums from the batch under test, review of the solidification parameters for adequacy, development of alternative solidification parameters, if necessary, and subsequent verification of alternative solidification parameters, if implemented.

Justification

The proposed Technical Specification 3.12.2 is submitted in response to the requirements of the Radiological Effluent Technical Specifications for PWR's (NUREG-0472).

The model specification presented in NUREG-0472 has not been duplicated due to the District's current methodology for solidification of wet radioactive waste materials. The proposed specification will satisfy the requirements of the Federal Regulations governing solid radioactive waste materials in addition to the requirements of specific disposal sites.

Significant Hazards Consideration

The proposed Technical Specification 3.12.2 has been reviewed with respect to the requirements of 10 CFR 50.59 and resulted in the following conclusions:

The change will not increase the probability or consequences of an accident previously evaluated because the change does not involve or affect any equipment necessary to mitigate the consequences of an accident. The change provides surveillance requirements necessary to implement specification 2.9.2 for Solid Radioactive Waste.

The change will not create the possibility of a new or different kind of accident from any previously evaluated because no new equipment or systems are being installed. The change is to provide administrative controls which will ensure all solidified wet radioactive wastes are acceptable for transportation and disposal.

The change will not reduce any margins of safety because it establishes administrative controls to ensure compliance with applicable regulations. The margin of safety may actually be increased because the change will result in formal documentation that the PCP is effective and that waste is solidified prior to shipping.