

A. N. SHINPOCH
Secretary



Schneider

STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Olympia, Washington 98504-0095

October 3, 1985

Donald A. Nussbaumer
Assistant Director for State Agreement Programs
Office of State Programs
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Nussbaumer:

In your letter dated April 30, 1985, you requested our comments on the topical report entitled: "Fiberglass Reinforced Plastic High Integrity Containers", submitted by Chem-Nuclear Systems, Inc. We have reviewed the Topical Report, Number CNSI-FRP-14571-01-NP against criteria established for stabilization of radioactive waste as outlined in the NRC Branch Technical Position (BTP). After completing our review of this report, we are in concurrence with all comments generated by your staff.

While reviewing the data presented in the topical report, we had specific concerns with the lack of Hanford specific test results addressed in the guidance on HIC's in the BTP. We are disappointed that the Topical Report submitted by CNSI did not more fully update previous reports submitted to South Carolina. In addition to the comments generated by the NRC in your review, the department would like to see data directed towards the testing described in the BTP particularly in regards to biodegradation, UV degradation, temperature cycling, and a 25 foot drop on to compacted sand at the most vulnerable package orientation. We are concerned about the applicability of this package to waste streams with Class B/C concentrations of C-14 and H-3.

We continue to question the need for vents on packages and request clarification from NRC as to whether a passive vent system will be required on this "pressure vessel".

It remains difficult to review a submittal which has all proprietary portions removed, as it appears the data and facts substantiating many of the claims in the text portion of the report are considered proprietary.

Sincerely,

Nancy P. Kirner

Nancy P. Kirner, Supervisor
Waste Management Unit

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