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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 29, 1980
NRC/TMI-80-138

Docket No. 50-320

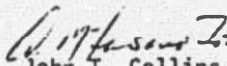
Mr. R. C. Arnold
Senior Vice President
Metropolitan Edison Company
100 Interpace Parkway
Parsippany, New Jersey 07054

Dear Mr. Arnold:

Subject: Interim Solid Waste Staging Facility

Letter TLL-379 dated August 12, 1980, forwarded the Design Criteria documents for the Interim Solid Waste Staging Facility and requested our comments. Our initial review revealed that additional information is required.

The enclosure to this letter is a list of questions and requests for additional information. To facilitate your response, we are prepared to meet with you to discuss our comments in more detail.


John T. Collins
Deputy Program Director
TMI Program Office

Enclosure: As Stated

8011060522

Mr. G. K. Hovey
Director, Unit 2
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. J. J. Barton
Manager, Site Operations, Unit 2
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. B. Elam
Manager, Plant Engineering, Unit 2
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. L. W. Harding
Supervisor, Licensing
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. E. G. Wallace
Licensing Manager
GPU Service Corporation
100 Interpace Parkway
Parsippany, NJ 07054

Mr. I. R. Finfrock, Jr.
Director-Oyster Creek
Jersey Central Power & Light Company
Madison Avenue at Punch Bowl Road
Morristown, NJ 07950

Mr. R. W. Conrad
Vice President-Generation
Pennsylvania Electric Company
1007 Broad Street
Johnstown, PA 15907

Mr. R. F. Wilson
Director-Technical Functions
GPU Service Corporation
100 Interpace Parkway
Parsippany, NJ 07054

Mr. J. G. Herbein
Director
Nuclear Assurance
Metropolitan Edison Company
P.O. Box 480
Middletown, PA 17057

J. B. Lieberman, Esquire
Berlock, Israel, Lieberman
26 Broadway
New York, NY 10004

George F. Trowbridge, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, DC 20036

Ms. Mary V. Southard, Chairperson
Citizens for a Safe Environment
P. O. Box 405
Harrisburg, PA 17108

Dr. Walter H. Jordan
881 W. Outer Drive
Oak Ridge, TN 37830

Or. Linda W. Little
5000 Hermitage Drive
Raleigh, NC 27612

Karin W. Carter, Esquire
505 Executive House
P. O. Box 2357
Harrisburg, PA 17120

Honorable Mark Cohen
512 E-3 Main Capital Building
Harrisburg, PA 17120

Ellyn Weiss, Esquire
Sheldon, Harmon, Roisman & Weiss
1725 I Street, N.W., Suite 506
Washington, DC 20006

Mr. Steven C. Sholly
304 S. Market Street
Mechanicsburg, PA 17055

Mr. Thomas Gerusky
Bureau of Radiation Protection
P. O. Box 2063
Harrisburg, PA 17120

Mr. Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, PA 19149

Ms. Jane Lee
R. D. 3, Box 3521
Etters, PA 17319

Walter W. Cohen, Consumer Advocate
Department of Justice
Strawberry Square, 14th Floor
Harrisburg, PA 17127

Robert L. Knupp, Esquire
Assistant Solicitor
Knupp and Andrews
P. O. Box P
407 N. Front Street
Harrisburg, PA 17108

John E. Minnich, Chairperson
Dauphin Co. Board of Commissioners
Dauphin County Courthouse
Front and Market Streets
Harrisburg, PA 17101

Robert Q. Pollard
Chesapeake Energy Alliance
609 Montpelier Street
Baltimore, MD 21218

Chauncey Kepford
Judith H. Johnsrud
Environmental Coalition on Nuclear Power
433 Orlando Avenue
State College, PA 16801

Ms. Frieda Berryhill, Chairperson
Coalition for Nuclear Power Plant
Postponement
2610 Grendon Drive
Wilmington, DE 19808

Holly S. Keck
Anti-Nuclear Group Representing York
245 W. Philadelphia Street
York, PA 17404

John Levin, Esquire
Pennsylvania Public Utilities Commission
P. O. Box 3265
Harrisburg, PA 17120

Jordon D. Cunningham, Esquire
Fox, Farr and Cunningham
2320 N. Second Street
Harrisburg, PA 17110

Ms. Kathy McCaughin
Three Mile Island Alert, Inc.
23 South 21st Street
Harrisburg, PA 17104

Ms. Marjorie M. Aamodt
R. D. #5
Coatesville, PA 19320

Ms. Karen Sheldon
Sheldon, Harmon, Roisman & Weiss
1725 I Street, N.W., Suite 506
Washington, DC 20006

Earl B. Hoffman
Dauphin County Commissioner
Dauphin County Courthouse
Front and Market Street
Harrisburg, PA 17101

Government Publications Section
State of Library of Pennsylvania
Box 1601 Education Building
Harrisburg, PA 17127

Dr. Edward O. Swartz
Board of Supervisors
Londonderry Township
RFD #1 Geyers Church Road
Middletown, PA 17057

R. C. Arnold
Metropolitan Edison Company

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U. S. Environmental Protection Agency
Region III Office
ATTN: EIS COORDINATOR
Curtis Building (Sixth Floor)
6th and Walnut Streets
Philadelphia, PA 19106

Dauphin County Office Emergency
Preparedness
Court House, Room 7
Front and Market Streets
Harrisburg, PA 17101

Department of Environmental Resources
ATTN: Director, Office of
Radiological Health
P. O. Box 2063
Harrisburg, PA 17105

Governor's Office of State
Planning and Development
ATTN: Coordinator, Pennsylvania
Clearinghouse
P. O. Box 1323
Harrisburg, PA 17120

Mrs. Rhoda D. Carr
1402 Marene Drive
Harrisburg, PA 17109

Mr. Richard Roberts
The Patriot
812 Market Street
Harrisburg, PA 17105

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
Suite 420, 7735 Old Georgetown Road
Bethesda, MD 20014

Ivan W. Smith, Esquire
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Appeal Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Docketing and Service Section
U. S. Nuclear Regulatory Commission
Washington, DC 20555

ENCLOSURE

1. To clearly establish the type of waste that the licensee intends to store in this facility, define the term "Low Level" as used in Section 1.0.
2. Describe the features of the design which will ensure that there will be no standing liquids where the wastes will be stored (i.e. how does the design ensure that the liquids drain to the sump and do not remain in the storage area?).
3. Describe the source and the expected amount of liquids released from the facility.
4. Describe the plan for disposition of the liquids in the sump. Include sampling procedures and criteria in the response.
5. Describe the activities that will be ongoing in areas adjacent to the proposed facility. Will shield walls be constructed to minimize exposures to personnel performing work in adjacent areas?
6. Section 4.2 states that "The slab and columns shall be coated to the height necessary to allow decontamination of the surfaces." Describe the method for determining this height.
7. Section 4.3 states that "Only those personnel actively involved in the material handling activities should be allowed inside the fence enclosing the ISWSF." Describe the actions to be taken to ensure this statement is enforced.
8. Section 5.1 states that "The ISWSF will allow separation of Unit I wastes from Unit II wastes." Describe the administrative controls to ensure separation and the physical design features of the facility which ensure separation.
9. The administrative controls on radiation levels, as described in section 5.3, are not clearly understood. Are there separate administrative levels for each type of container depending on which unit originates the waste?
10. Describe the administrative limits and physical design features which ensure that waste containers will not be vertically stacked beyond the ability of the containers to support the weight or beyond the point at which it will not be safe for men or equipment to stack and retrieve the containers.
11. Provide a figure showing the exact location of the ISWSF.
12. Section 5.5.1, last paragraph, states that "The location of the ISWSF also governs the radiation level of packages which may be stored there without shielding." Is it the intent of Table 5-1 to establish this radiation level? If not, provide this data and explain what is meant by the astericked (*) note at the bottom of Table 5-1.

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13. Provide the results of the fire hazards analysis required by Section 5.8 and identify the specific fire protection requirements.
14. Describe what is meant by the column labeled "Quantity (per month)."
Is this column the estimated waste generation rates? Is the facility being designed to store the waste generated in one month time using the figures in this column?
15. Provide an analysis of offsite hazards under accident conditions.
16. Describe design features to prevent waste containers from being blown away by high winds.
17. Provide a description of the shielding provisions for the packages requiring shielding. Include a description of the method used to determine if the shielding is adequate.
18. Provide a discussion of the maximum time a container will remain in the ISWSF. If carbon steel containers are to remain in storage for greater than two years, provide a detailed analysis of the adequacy of the containers.