

Docket No. 50-320

JUL 28 1981

Mr. Gale K. Hovey
Vice President and
Director of TMI-2
Metropolitan Edison Company
P.O. Box 480
Middletown, Pennsylvania 17057

Dear Mr. Hovey:

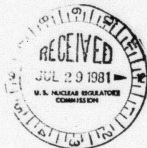
On June 17, 1981 (LL2-81-0158), you submitted for our review and approval the Technical Evaluation Report and Design Criteria for the Interim Solid Waste Staging Facility (ISWSF). Our comments on the Technical Evaluation Report and Design Criteria are enclosed and need satisfactory resolution prior to our approval of the ISWSF design criteria.

Sincerely,

BS
Bernard J. Snyder, Program Director
TMI Program Office
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/encl:
See attached



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PDR ADDCK 05000320
P PDR

OFFICE	TMIPO:NRR	TMIPO:NRR					
SURNAME	RWeller/prf	BSnyder					
DATE	7/27/81	7/27/81					

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Service list
(see attached)

NRC STAFF COMMENTS ON
MET-ED'S TECHNICAL EVALUATION
REPORT AND DESIGN CRITERIA
FOR INTERIM SOLID WASTE
STAGING FACILITY (ISWSF)

TER COMMENTS

1. Paragraph 2.2.3 states that: "With the exception of small quantities of electrical cable ... all materials used in the construction of the facility are noncombustible." Other combustible loads should also be considered. What are the radiological consequences of a fire: (a) in a vehicle with a full tank of gas that is parked in the ISWSF truck bay, and (b) in an area where a two week supply of spare wooden pallets are stored? What detection and fire fighting equipment has been committed to combatting such fires?
2. Paragraph 2.2.3 states that: "The floor slab is sloped so that any water entering the facility will be directed toward one of the six sumps provided ... water collected in these sumps will be disposed of in accordance with established plant operation procedures." GPU should describe their physical/administrative controls for effluent monitoring in these sumps, and controls to assure proper disposal/treatment.
3. Paragraph 2.3 states that: "No radiation monitors are provided in the facility." GPU should describe their administrative controls for radiation monitoring at the ISWSF, including the monitoring frequency.
4. Section 2.4.1 discusses preparation of the waste packages for shipment. This section states that swipes, counting and decontamination will be performed prior to transfer of the wastes to the ISWSF. As a routine

practice, will waste containers also be swiped and counted following the storage period prior to shipment offsite? If not, what assurance will be provided that containers will not be recontaminated during the storage period?

5. Paragraph 3.2.1.2.4 states that: "The ISWSF is not protected against the PMF (probable maximum flood); therefore, the ISWSF will be inundated in the very unlikely event a PMF occurs." GPU should describe their physical/ administrative controls for preventing waste packages from being carried away from the facility and/or broken open by flood waters.
6. In section 3.3, you state that 80% of the projected occupational exposure from use of the ISWSF will be attributable to radioactive waste originating in Unit 1. However, based on the expected quantity and radiation level of the wastes from both Unit 1 and Unit 2, as shown in Table 2-1 (Design Storage Requirements), it is not apparent that 80% of the expected occupational exposure will be attributable to Unit 1 wastes. Provide the basis for the 80% figure.

DESIGN CRITERIA COMMENTS

1. Section 5.8 (Fire Protection Requirements) states that a fire hazards analysis will be performed. Provide the results of your analysis as well as a description of the fire protection system for the ISWSF.

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