

SUBMISSION
W/ #5
D'ARRIGO

Vogtle Electric Generating Plant, Units 3 & 4
 COL Application
 Part 2 — FSAR

11.4 SOLID WASTE MANAGEMENT

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

Add the following after DCD Subsection 11.4.2.4.2:

11.4.2.4.3 Alternatives for B and C Wastes

VECP COL 11.4-1 It is expected that Class B and C wastes will constitute approximately 5 percent by volume of the low level radioactive waste (LLRW) that will be generated by the plant with the balance being Class A waste. The volume of wet Class B and C waste is approximately 100 percent of the total Class B and C waste. As of July 1, 2008, the LLRW disposal facility in Barnwell, South Carolina is no longer accepting Class B and C waste from sources in states that are outside of the Atlantic Compact. However, the disposal facility in Clive, Utah is still accepting Class A waste from out of state. Should there be no disposal facilities that will accept the Class B and C wastes after the plant begins operation, there are several options available for storage of such waste:

- As provided in referenced DCD Subsection 11.4.2., the Auxiliary Building is designed to have more than a year of spent resin storage capacity at the expected rate and the spent resin tanks may be mixed to limit the radioactivity concentrations thereby limiting the volume of Class B and C wet waste requiring storage.
- Vendor services are available to process Class A, B, and C waste and transfer for storage of that material until a disposal site is available. Currently, Waste Control Specialists (WCS) of Texas is available to store Class A, B, and C material pending the availability of a licensed disposal site.
- If additional storage capacity were eventually needed, the plant could construct or expand storage facilities onsite or gain access to a storage facility at another licensed nuclear plant.

11.4.5 QUALITY ASSURANCE

Add the following to the end of DCD Subsection 11.4.5:

Since the impact of radwaste systems on safety is limited, the extent of control required by Appendix B to 10 CFR Part 50 is similarly limited. Thus, a

STD SUP 11.4-1

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supplemental quality assurance program applicable to design, construction, installation and testing provisions of the solid radwaste system is established by procedures that comply with the guidance presented in Regulatory Guide 1.143.

11.4.6 COMBINED LICENSE INFORMATION FOR SOLID WASTE MANAGEMENT SYSTEM PROCESS CONTROL PROGRAM

Add the following information to the end of DCD Subsection 11.4.6.

This COL Item is addressed below.

STD COL 11.4-1

A Process Control Program (PCP) is developed and implemented in accordance with the recommendations and guidance of NEI 07-10A (Reference 201). The PCP describes the administrative and operational controls used for the solidification of liquid or wet solid waste and the dewatering of wet solid waste. Its purpose is to provide the necessary controls such that the final disposal waste product meets applicable federal regulations (10 CFR Parts 20, 50, 61, 71, and 49 CFR Part 173), state regulations, and disposal site waste form requirements for burial at a low level waste (LLW) disposal site that is licensed in accordance with 10 CFR Part 61.

Waste processing (solidification or dewatering) equipment and services may be provided by the plant or by third-party vendors. Each process used meets the applicable requirements of the PCP.

No additional onsite radwaste storage is required beyond that described in the DCD.

Table 13.4-201 provides milestones for PCP implementation.

11.4.6.1 Procedures

STD SUP 11.4-1

Operating procedures specify the processes to be followed to ship waste that complies with the waste acceptance criteria (WAC) of the disposal site, 10 CFR 61.55 and 61.56, and the requirements of third party waste processors.

Each waste stream process is controlled by procedures that specify the process for packaging, shipment, material properties, destination (for disposal or further processing), testing to verify compliance, the process to address non-conforming materials, and required documentation.

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Where materials are to be disposed of as non-radioactive waste (as described in DCD Subsection 11.4.2.3.3), final measurements of each package are performed to verify there has not been an accumulation of licensed material resulting from a buildup of multiple, non-detectable quantities. These measurements are obtained using sensitive scintillation detectors, or instruments of equal sensitivity, in a low-background area.

Procedures document maintenance activities, spill abatement, upset condition recovery, and training.

Procedures document the periodic review and revision, as necessary, of the PCP based on changes to the disposal site, WAC regulations, and third party PCPs.

11.4.6.2 Third Party Vendors

Third party equipment suppliers and/or waste processors are required to supply approved PCPs. Third party vendor PCPs describe compliance with Regulatory Guide 1.143, Generic Letter 80-09, and Generic Letter 81-39. Third party vendor PCPs are referenced appropriately in the plant PCP before commencement of waste processing.

11.4.6.3 Long Term On-Site Storage Facility

VEGP SUP 11.4-1
Storage space for six-month's volume of packaged waste is provided in the radwaste building. Radioactive waste generated by VEGP Units 3 and 4 will normally be shipped to a licensed disposal or off-site storage facility. However, should disposal facilities or off-site storage facilities not be available, storage capacity will be expanded as described below to provide additional on-site storage for VEGP Units 3 and 4.

Additional on-site low-level radioactive waste (LLRW) storage capabilities are available if Class B and C waste cannot be disposed at a licensed disposal facility. An outside storage pad will be utilized to provide this capability. The VEGP Units 3 and 4 LLRW storage facility would be located outside the Protected Area (PA) in the Owner Controlled Area (OCA). The storage facility would be enclosed by an eight-foot high fence with locked gates and would be provided with area lighting. The storage of LLRW would be in high integrity containers (HICs) or other suitable containers that will not decay over time, which would be stored within shielded containers. The design of the storage facility will comply with the guidance of documents as identified in this section which is consistent with NUREG-0800, Appendix 11.4A. The design storage capacity is based on the expected generation in Table 11.4-1, industry experience that indicates approximately 100% of the Class B and C waste is expected to be in the form of wet waste, and volume minimization/reduction programs. The site waste management plan will include radioactive wet waste reduction initiatives for waste Class B and C.

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The storage facility will be sited such that it could be sized to accommodate storage of Class B and C waste over the operating life of the plant and designed to accommodate future expansion as needed. Capacity would be added in phases based on the expected availability of off-site treatment and storage, and disposal facilities.

11.4.6.3.1 Outside Storage Pad Design Considerations

The following design considerations would be applied to the on-site LLRW storage facility: (References 202, 203, and 204):

- The location of the storage pad would meet the dose rate criteria of 40 CFR 190 and 10 CFR 20.1302 for both the site boundary and unrestricted area. The onsite storage will be located such that any additional dose contributes less than 1 mrem per year to the 40 CFR Part 190 limits. Onsite dose limits will be controlled per 10 CFR 20, including the ALARA principle of 10 CFR 20.1101.
- The outside storage pad would be an engineered feature designed to minimize settling and would be constructed of reinforced concrete or engineered gravel.
- The storage pad location would avoid natural or engineered surface drainage and be located at an elevation with regard to the site's design bases flood level.
- The storage pad would have a fence or other suitable security measures consistent with its location on the site.
- The waste containers (typically high integrity containers) would be stored inside of a shielded container, typically consisting of reinforced concrete containers that provide radiation shielding and weather protection.
- The configuration of the storage shields would be arranged to be accessible from the perimeter road or from a center aisle using a mobile crane (if used).
- Personnel passages would be provided between rows of storage shields for access to the container for inspection.
- Adequate electrical power and lighting would be provided at the storage facility to allow power for tools, analytical equipment, sample pumps, radiation instruments, boroscope lights, etc.
- Fire protection, fire hydrants or fire extinguishers, for vehicle fires should be provided.

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11.4.6.3.2 Outside Storage Pad Operating Considerations

The following operating considerations for on-site storage pad operations are based on NRC and industry guidance (References 202, 203 and 204) and would be included in operating procedures:

- Identification of the arrangement of storage shields, waste handling, storage methods, safety analysis limitations, accident conditions, and off site dose calculations.
- The use of hold-down devices to secure the waste container during severe environmental events, such as strong wind would be provided for, unless the waste container and storage shields can be demonstrated to remain in place without restraints during such events.
- The waste container selected for use is compatible with the waste form stored to ensure waste container integrity.
- Shielding requirements would be determined before the waste container is loaded into a storage shield to eliminate the radiation exposure associated with adding additional shielding.
- If additional shield walls around the perimeter of the storage pad are required, the shield walls would be easily installed and capable of being moved.
- Periodic inspection and testing requirements for outside storage pad operation would include the following:
 - Dose rate and contamination surveys in accordance with health physics procedures.
 - Sampling of storage shields for water and storage shields containing dehydrated resin for explosive gas build-up.
 - Visual inspection of selected waste containers in storage to detect unexpected changes / container integrity. (Remote inspection methods and the use of high integrity containers will allow reduced scope for ALARA practices.)
 - Defoliation and general condition of the onsite storage pad.
- Total radioactive material inventory limits would be established to demonstrate compliance with the design limits for the storage area, dose limits for members of the public and safety features or measures provided by the storage module.

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- The contents of records for inventory controls, monitoring and inspection and other relevant data are maintained and retrievable.
- Operational safety features for handling waste containers and storage shields would include the training required for personnel operating cranes, forklifts, tie downs and heavy equipment during any waste container/storage shield transfer activity.
- Criteria for the end of storage period that would include waste container inspection and additional reprocessing required prior to shipment offsite.

11.4.7 REFERENCES

201. NEI 07-10A, "Generic FSAR Template Guidance for Process Control Program (PCP)," Revision 0, March 2009.
202. Technical Report 1018644 "Guidelines for Operating an Interim On Site Low Level Radioactive Waste Storage Facility," Revision 1, EPRI, Palo Alto, CA, February 2009.
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11.4.2.4.3 Alternatives for B and C Wastes

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- If additional storage capacity were eventually needed, the plant could construct or expand storage facilities onsite or gain access to a storage facility at another licensed nuclear plant.

11.4.5 QUALITY ASSURANCE

Add the following to the end of DCD Subsection 11.4.5:

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- Since the impact of radwaste systems on safety is limited, the extent of control required by Appendix B to 10 CFR Part 50 is similarly limited. Thus, a

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11.4.5 COMBINED LICENSE INFORMATION FOR SOLID WASTE
MANAGEMENT SYSTEM PROCESS CONTROL PROGRAM

Add the following information to the end of DCD Subsection 11.4.6.

This COL item is addressed below.

STD COL 11.4-1

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Waste processing (solidification or dewatering) equipment and services may be provided by the plant or by third-party vendors. Each process used meets the applicable requirements of the PCP.

No additional onsite radwaste storage is required beyond that described in the DCD.

Table 13.4-201 provides milestones for PCP implementation.

11.4.6.1 Procedures

STD SUP 11.4-1

Operating procedures specify the processes to be followed to ship waste that complies with the waste acceptance criteria (WAC) of the disposal site, 10 CFR 61.55 and 61.56, and the requirements of third party waste processors.

Each waste stream process is controlled by procedures that specify the process for packaging, shipment, material properties, destination (for disposal or further processing), testing to verify compliance, the process to address non-conforming materials, and required documentation.

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Where materials are to be disposed of as non-radioactive waste (as described in DCD Subsection 11.4.2.3.3), final measurements of each package are performed to verify there has not been an accumulation of licensed material resulting from a buildup of multiple, non-detectable quantities. These measurements are obtained using sensitive scintillation detectors, or instruments of equal sensitivity, in a low-background area.

Procedures document maintenance activities, spill abatement, upset condition recovery, and training.

Procedures document the periodic review and revision, as necessary, of the PCP based on changes to the disposal site, WAC regulations, and third party PCP's.

11.4.6.2 Third Party Vendors

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11.4.6.3 Long Term On-Site Storage Facility

VEGP SUP 11.4-1 Storage space for six-month's volume of packaged waste is provided in the radwaste building. Radioactive waste generated by VEGP Units 3 and 4 will normally be shipped to a licensed disposal or off-site storage facility. However, should disposal facilities or off-site storage facilities not be available, storage capacity will be expanded as described below to provide additional on-site storage for VEGP Units 3 and 4.

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The storage facility will be sited such that it could be sized to accommodate storage of Class B and C waste over the operating life of the plant and designed to accommodate future expansion as needed. Capacity would be added in phases based on the expected availability of off-site treatment and storage, and disposal facilities.

11.4.6.3.1 Outside Storage Pad Design Considerations

The following design considerations would be applied to the on-site LLRW storage facility. (References 202, 203, and 204):

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11.4.6.3.2 Outside Storage Pad Operating Considerations

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- The waste container selected for use is compatible with the waste form stored to ensure waste container integrity.
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 - Visual inspection of selected waste containers in storage to detect unexpected changes / container integrity. (Remote inspection methods and the use of high integrity containers will allow reduced scope for ALARA practices.)
 - Defoliation and general condition of the onsite storage pad.
- Total radioactive material inventory limits would be established to demonstrate compliance with the design limits for the storage area, dose limits for members of the public and safety features or measures provided by the storage module.

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- The contents of records for inventory controls, monitoring and inspection and other relevant data are maintained and retrievable.
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11.4.7 REFERENCES

201. NEI 07-10A, "Generic FSAR Template Guidance for Process Control Program (PCP)," Revision 0, March 2009.
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Revision 2

