

William H. Spence
Executive Vice President and
Chief Operating Officer/Chief Nuclear Officer
Tel. 610.774.3683 Fax 610.774.5019
Whspence@pplweb.com

RULES AND DIRECTIVES

PPL Corporation
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.5151
www.pplweb.com



DEC 29 2008

2008 JAN 23 AM 10: 28

RECEIVED

Rulemaking, Directives, and Editing Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

11/04/08
73 FR 65705

(2)

SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON DRAFT REGULATORY GUIDE DG-1186 Docket Nos. 50-387
PLA-6466 and 50-388

References: 1) Draft Regulatory Guide DG-1186, "Measuring, Evaluating, and Reporting
Radioactive Material in Liquid and Gaseous Effluents and Solid Waste,"
dated October 2008.

2) Federal Register dated November 4, 2008.

On Tuesday, November 4, 2008, in Vol. 73, No. 214 of the *Federal Register*, the U. S. Nuclear Regulatory Commission (NRC) published a proposed draft Regulatory Guide for comment regarding the measurement, evaluation, and reporting of radioactive material in liquid and gaseous effluents and solid waste. This letter provides PPL Susquehanna, LLC (PPL) comments on the draft Regulatory Guide, which are included in the attachment.

If you have any questions, please contact Mr. Charlie Manges at (570) 542-3089.

W. H. Spence for W. H. Spence

W. H. Spence

Attachment: PPL comments on draft Regulatory Guide DG-1186

cc: NRC Region I
Mr. R. Janati, DEP/BRP
Mr. F. W. Jaxheimer, NRC Sr. Resident Inspector
Mr. B. K. Vaidya, NRC Project Manager

50 NSI Review Complete
Template = ADM-013

FRDS = ADM-03
Call = F. O'Connell (exo)

Attachment to PLA-6466

Comments on Draft Regulatory Guide DG-1186

COMMENTS ON DRAFT REGULATORY GUIDE DG-1186

(Proposed Revision 2 of Regulatory Guide 1.21)

1. Clarify the requirements for reporting of air particulates with half lives less than eight days. Tables A1A through A1F reference short lived airborne particulate radioisotopes such as Cesium 138 (which has a 2 minute half life). Dose assessments Section 9.4.1.3 references dose calculations for particulates with half lives greater than 8 days. There does not appear to be reasonable justification for reporting air particulate radioisotopes with half lives of less than eight days.
2. Rh-188 is listed in Tables A1A through A1F. There is no such isotope listed in any of the references available to us. Also included in Tables A1A through A1F is Zn-72. Zn-72 is an isotope (with a short half life of 46 hours) not normally identified in reactor coolant, solid radioactive waste or radioactive effluent samples. This isotope should not be included in the reporting table.
3. Source term trending (ten year trend period) is a new requirement. Please clarify the term "source term" as referenced in Sections 8.1 and 8.2.
4. Section 5.11.5 states, "Based on the above information, the dose calculations are performed as shown below." The referenced dose calculations in Sections 5.11.5.1.1, 5.11.5.1.2, 5.11.5.2.1, 5.11.5.3.1 and 5.11.5.3.2 appear to use an incorrect value for Whole Body and Organ dose due to on-site pond H-3 evaporation to nearest residence (ingestion, leafy vegetables). 0.017 mrem is the value used in the dose calculations but the value referenced (from Section 5.11.4) for use in the calculations is 0.0017 mrem.
5. Section 9.2.1 details reporting of liquid waste dilution flow, specifically, "external dilution flow rate, average (river or stream flow rates)." Please clarify the averaging period for external dilution flow rate (daily during periods of release, monthly, quarterly, annual).
6. Section 9.5.8.1; "Omissions from previously submitted Arrears." Please correct/clarify/define "Arrears."