

POWER AUTHORITY OF THE STATE OF NEW YORK

10 COLUMBUS CIRCLE • NEW YORK, N. Y. 10019

(212) 397-6200

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November 1, 1979
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Director, Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. W. P. Gammill, Acting Assistant Director
Operating Reactor Projects
Division of Operating Reactors

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Implementation of the EPA Uranium
Fuel Cycle Standard 40 CFR Part 190

Dear Sir:

Your letter of September 17, 1979, received by this office on October 5, 1979, states that the provisions of the EPA Uranium Fuel Cycle Standard, 40 CFR Part 190, must be implemented by December 1, 1979. The Power Authority, committed to full compliance with 40 CFR 190, in our submittals to the Commission of new proposed radiological effluent technical specifications, transmitted to Mr. Albert Schwencer, Chief, Operating Reactors Branch No. 1, Division of Operating Reactors, on May 2, 1979, and on August 31, 1979. This submittal was in the format of the standard technical specifications for pressurized water reactors.

The existing environmental technical specifications for the Indian Point site, issued December 12, 1975, already commit the Power Authority to full compliance with 40 CFR 190. The objective, specifications, and basis for sections 2.4 and 3.4 of these technical specifications specifically limit all releases from the site such that compliance with annual average limits for discharges from the site would result in a maximum of twenty millirem of whole body dose to an individual offsite or sixty millirem thyroid dose for such an individual. This would demonstrate that the 40 CFR 190 limits of twenty-five millirem to the whole body, and seventy-five millirem to the thyroid would be complied with for releases from the Indian Point site. It should be further pointed out at

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this time, that the Indian Point site has always been in full compliance with these specifications and actual calculated discharges for releases from the site have been substantially lower than five millirem whole body and five millirem thyroid dose since initial criticality of the Indian Point 3 facility. This dose is a dose from the operation of all reactors at the Indian Point site.

In a meeting held at King of Prussia, Pennsylvania, for Region I licensees, it was pointed out by NRC staff that only other fuel cycle facilities within a twenty-five mile radius of the site would have to be included in evaluation of compliance with 40 CFR Part 190.

Since there are no other fuel cycle facilities within this distance from the Indian Point 3 site, we can conclude that we are in full compliance with 40 CFR 190.

If you have any further questions concerning the contents of this letter, or our compliance with 40 CFR 190, please give me a call. To summarize, the Indian Point 3 facility is now and has always been in compliance with 40 CFR Part 190.

Very truly yours,


Paul J. Early
Assistant Chief Engineering-Projects

cc: Hon. George D. Begany
White Plains Library