

POWER AUTHORITY OF THE STATE OF NEW YORK

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August 31, 1979  
IPN-79-67

REGULATORY DOCKET FILE COPY

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

Attention: Mr. Albert Schwencer, Chief  
Operating Reactors Branch No. 1  
Division of Operating Reactors

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Proposed Radiological Effluent and  
Monitoring Technical Specifications

Dear Sir:

Enclosed for filing are three (3) signed originals and nineteen (19) copies of a document entitled, "Application for Amendment to Operating License", and attachments thereto.

This application seeks to amend Sections 3/4 and 6 of Appendix A and Sections 2, 3 and 5 of Appendix B on radiological environmental monitoring and administrative controls for the subject item.

These proposed specifications supplement the proposed specification submitted by the Authority of May 2, 1979 (IPN-79-24) in response to Mr. Brian Grimes' letter of November 15, 1978 concerning the same subject.

In response to a verbal request from Mr. L. Olshan of your staff, enclosed please find ten (10) copies of the Offsite Dose Calculation Manual (ODCM). The Authority does not consider this ODCM to be part of the technical specifications for the Indian Point 3 facility. The ODCM shall describe the methodology and parameters to be used in the calculation of offsite doses due to radioactive gaseous and liquid effluents and in the calculation of gaseous and liquid effluents monitoring instrumentation alarm/trip setpoints consistent with the applicable limiting conditions for operation contained in the proposed Technical Specifications. The ODCM shall be maintained at the plant and will reflect accepted methodologies and calculational procedures, and therefore is referenced in the proposed Technical Specifications.

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Since the waste disposal system at the Indian Point 3 facility already complies with the regulations set forth in 10 CFR §50.34a, Appendix A Criterion 60, and Appendix I, the Authority believes that further commitments to your request of November 15, 1978 for waste solidification cannot be made at this time.

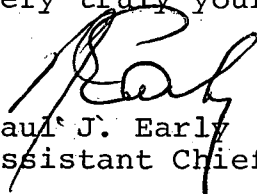
The Authority believes that the requirements for the shipment of radioactive wastes in 10 CFR §71 do not require solidification where a qualified shipping container is used for transportation. In addition, the Department of Transportation and the burial sites themselves do not require that waste be solidified. The Authority does not agree with the NRC staff's definition of solidification, particularly the requirement for homogeneity. The Authority believes that compared to the benefits achieved, the projected dose levels associated with your requested solid waste surveillance requirements are inconsistent with the ALARA program.

The Authority would also be interested in receiving a copy of the documentation upon which your staff concluded that the proposed actions in your November 15, 1978 letter will provide substantial additional protection of the public health and safety as stipulated under 10 CFR §50.109.

Since the application supplements a previous application on the same subject (IPN-79-24, dated May 2, 1979) for which the application fee has already been paid under protest, no additional application fee is required.

In support of this application, we are enclosing forty (40) copies of the Safety Evaluation corresponding to the proposed Technical Specification changes.

Very truly yours,

  
Paul J. Early  
Assistant Chief Engineer-Projects

Encs.

cc: Hon. George V. Begany  
White Plains Library