## PUBLIC HEALTH REVIEW

INDIAN POINT NUCLEAR GENERATING UNIT 2

Project Officer: Gerald Pliner

Reviewed By:

James E. Martin/Ph.D. Acting Chief

Nuclear Facilities Branch

B111100902 701005 PDR ADDCK 05000247

PDR

Approved By:

Ernest D. Harward Deputy Director Division of Environmental Radiation

September 1970

U.S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE Public Health Service Environmental Health Service Bureau of Radiological Health Division of Environmental Radiation Nuclear Facilities Branch

This report is one of a series designed to summarize the results of evaluations by the Public Health Service of the environmental effects of nuclear facilities. The evaluation is based on a detailed technical review of design information for the facility as well as the "Environmental Statement" submitted to the Atomic Energy Commission under the conditions of the National Environmental Policy Act of 1969. Reviews of individual facilities are performed by the Nuclear Facilities Branch of the Division of Environmental Radiation, Bureau of Radiological Health. The Branch, as a part of this review process, has developed and referenced several technical documents to support the discussions presented.

The evaluation presented in this report is directly responsive to the requirements placed on Federal agencies by the National Environmental Policy Act and as such is intended to state the position of the Department of Health, Education, and Welfare on the environmental effects of the operation of the facility. The report is also intended, in the traditional role of the Public Health Service, to provide information to the particular State health department involved for use in conducting their radiological health program for the facility.

## SUMMARY AND CONCLUSIONS

This report summarizes the conclusions drawn from an updating of two previous evaluations by the Public Health Service of the environmental effects of Indian Point Nuclear Generating Unit 2. The facility is a 2758 Mwt Westinghouse pressurized water reactor (PWR) that will be operated by the Consolidated Edison Company on the east bank of the Hudson River at Indian Point, Village of Buchanan, in Westchester, County, New York. This updating is based primarily on information supplied in the facility's Final Safety Analysis Report (FSAR),<sup>(1)</sup> including amendments 1-23, and the facility proposed technical specifications.<sup>(2)</sup> The Applicant's Environmental Report--Operating License Stage<sup>(3)</sup> has been reviewed, but was used only as a secondary source of information due to its lack of technical data. The conclusions drawn from this review are listed below:

1. The estimate of liquid radioactivity discharges (0.0252 Ci/yr exclusive of <sup>3</sup>H) for 1 percent defective fuel and the statement that radioactivity concentrations in the discharge canal will be 0.002 percent of maximum permissible concentrations are, in our judgment, not adequately documented. Current PWR operating experience indicates that both will be considerably higher and the applicant has not presented -new design information to support lower estimated discharges.

2. The environmental statement does not, but should, contain a commitment by the company to use all radioactive waste treatment and

holdup systems to their fullest capacity in order to keep discharges as low as practicable. In meeting this objective we believe the gaseous waste holdup capacity should be expanded to 60 days minimum.

Statutes and the second states

3. The proposed technical specification for the site gaseous waste discharge limit would be excessive if calculated by the method indicated by the applicant. Discharge limits for the Indian Point facility should also be applied to Consolidated Edison Nuclear Units 4 and 5 if these additional units are built at the proposed location about 1500 meters south of the Indian Point site.

4. The environmental surveillance program for the facility would be adequate if modified to include TLD's with a minimum sensitivity of 5-10 mr/month and gamma spectroscopy of drinking water and Hudson River and lake water samples.

5. At this stage of the construction of the plant the only alternative action is not to operate it, a choice that is unreasonable in view of the minimal environmental effects expected. Therefore, with the qualifications stated in this report, we are of the opinion that Indian Point Nuclear Generating Unit 2 can be operated along with Unit 1 without any significant impact on the environment and with minimal risk to public health.

RADIOACTIVE WASTE DISPOSAL

Indian Point Units 1, 2, and 3 should be treated as a single facility in establishing discharge limits. Discharge limits set for the Indian

Point plant should also be applied to Consolidated Edison Nuclear Units 4 and 5 if these additional units are built. We consider the location of Units 4 and 5 as being at the same site since the radioactive waste discharges from these two plants will result in radiation exposure to the same population group. The two sites are only 1500 meters apart, and will discharge radioactive materials to the same water and air environment.

격다 역구 여자

Estimates for gaseous releases from Indian Point Unit 2 are based on a 45-day holdup. We believe that this capacity should be expanded to 60 days and that the applicant should commit himself to utilize this capacity to its fullest extent at all times. A 60-day holdup time was selected to achieve a reduction of short-lived nuclides such as I-131 to essentially zero. The remainder of the waste disposal system should be utilized to its fullest capacity in order to keep both liquid and gaseous releases from the plant to as low a level as practicable. This position is taken because: 1) gaseous releases during normal operations at Indian Point Unit 1 have been much higher than at other similar operating PWR's which could be interpreted to indicate that gaseous waste holdup was not used to its fullest extent, (4,5) and 2) the potential expansion of nuclear capacity at this location warrants a full commitment to use all systems for each unit to their capacity to keep the cumulative population doses as low as practicable.

### RADIOACTIVE WASTE DISCHARGES

The applicant's estimate of liquid radioactive discharges indicates that with 1 percent defective fuel elements, a total of 0.0252 curies (exclusive of  ${}^{3}$ H) will be discharged annually. This estimate cannot be substantiated based on data available from present operating plants. According to AEC reports on 1969 waste discharges from licensed facilities, San Onofre, Indian Point 1, Connecticut Yankee, and Yankee-Rowe discharged 8, 28, 12, and 0.019 curies, respectively, of liquid wastes exclusive of  ${}^{3}$ H. <sup>(4)</sup> It is our understanding that none of these plants approached 1 percent defective fuel, and all of these PWR's operated at power levels much lower than that proposed for Indian Point Unit 2.

The Environmental Report estimates that liquid effluents at the point of discharge from Indian Point Unit 2 will be 0.002 percent of MPC. This appears to be underestimated even if the annual discharge estimates are assumed to be correct. Our estimates of liquid effluent levels are considerably higher.

The discussion of the gaseous discharge limit in the proposed technical specifications is not clear, and the equation for calculating the site limit appears to be incorrect. If the equation shown in the FSAR were used in calculating this limit, the resulting discharge limit would be too high. The equation should be modified to read as follows:

 $\sum_{u=1}^{u=3} \left[ f_u(\chi/Q)_u \times \Sigma \frac{R_i Q_{ui}}{MPC_i} \right] \le 1$ 

where u = an index for each of the three units onsite

 $Q_{ui}$  = the average release rate from unit u of radioisotope i  $f_u$  = the fraction of the allowable site release limit assigned to unit u. For only units 1 and 2 operating the technical specifications assign  $f_1$  = .1,  $f_2$  = .9

 $R_i$  = a factor which accounts for reconcentration in the environs. For halogens and particulates with half-lives greater than 8 days  $R_i$  = 700, for all other radioisotopes  $R_i$  = 1.

## ENVIRONMENTAL SURVEILLANCE

In general the operational surveillance program submitted by the applicant is adequate, however, it is suggested that a gamma scan be performed on all drinking, Hudson River, and lake water samples collected. In addition, <sup>3</sup>H measurements should be made on drinking water samples. The gamma scan is recommended because identification of radionuclides and determination of their individual concentrations is essential to the interpretation of environmental surveillance data in terms of population radiation exposure.

A minimum sensitivity of 1 mr/hr as proposed by the applicant for integrating dosimeters employed in the surveillance program is not feasible since during normal operation dose levels of this magnitude -5

would not be reached, nor is monthly collection of ionization chambers with an upper limit of 10 mr (this is probably the expected monthly background level). In order to avoid this problem we recommend the use of a TLD system with a minimum sensitivity of 5-10 mr/month.

#### REFERENCES

- "Indian Point Nuclear Generating Unit 2--Final Facility Description and Safety Analysis Report," Vols. 1-4, Docket No. <u>50-247</u>, Public Document Room, U.S. Atomic Energy Commission, Washington, D.C., October 15, 1968.
- "Indian Point Nuclear Generating Unit 2 Technical Specifications," Ibid., July 1970.
- 3. "Applicant's Environmental Report--Operating License Stage," Ibid., August 6, 1970.
- Rogers, L.R. and C. Gamertsfelder, "U.S. Regulations for Control of Releases of Radioactivity to the Environment from Nuclear Facilities," Division of Radiation Protection Standards, U.S. Atomic Energy Commission, Washington, D.C., August 1970.
- Logsdon, J.E., R.I. Chissler, "Radioactive Waste Discharges to the Environment From Nuclear Power Facilities," BRH/DER 70-2, U.S. Department of Health, Education, and Welfare, Public Health Service, Environmental Health Service, Bureau of Radiological Health, Rockville, Maryland, March 1970.
- Goldman, Morton, Jr., "United States Experience in Management of Gaseous Wastes from Nuclear Power Stations," NUS Corporation, Rockville, Maryland, August 30, 1968.

## PUBLIC HEALTH REVIEW

## INDIAN POINT NUCLEAR GENERATING UNIT 2

# Project Officer: Gerald Pliner

Reviewed By:

James E. Martín/Ph.D. Acting Chief

Nuclear Facilities Branch

Approved By:

Ernest D. Harward Deputy Director Division of Environmental Radiation

September 1970

U.S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE Public Health Service Environmental Health Service Bureau of Radiological Health Division of Environmental Radiation Nuclear Facilities Branch

### PREFACE

This report is one of a series designed to summarize the results of evaluations by the Public Health Service of the environmental effects of nuclear facilities. The evaluation is based on a detailed technical review of design information for the facility as well as the "Environmental Statement" submitted to the Atomic Energy Commission under the conditions of the National Environmental Policy Act of 1969. Reviews of individual facilities are performed by the Nuclear Facilities Branch of the Division of Environmental Radiation, Bureau of Radiological Health. The Branch, as a part of this review process, has developed and referenced several technical documents to support the discussions presented.

The evaluation presented in this report is directly responsive to the requirements placed on Federal agencies by the National Environmental Policy Act and as such is intended to state the position of the Department of Health, Education, and Welfare on the environmental effects of the operation of the facility. The report is also intended, in the traditional role of the Public Health Service, to provide information to the particular State health department involved for use in conducting their radiological health program for the facility.

## SUMMARY AND CONCLUSIONS

This report summarizes the conclusions drawn from an updating of two previous evaluations by the Public Health Service of the environmental effects of Indian Point Nuclear Generating Unit 2. The facility is a 2758 Mwt Westinghouse pressurized water reactor (PWR) that will be operated by the Consolidated Edison Company on the east bank of the Hudson River at Indian Point, Village of Buchanan, in Westchester, County, New York. This updating is based primarily on information supplied in the facility's Final Safety Analysis Report (FSAR),<sup>(1)</sup> including amendments 1-23, and the facility proposed technical specifications.<sup>(2)</sup> The Applicant's Environmental Report--Operating License Stage<sup>(3)</sup> has been reviewed, but was used only as a secondary source of information due to its lack of technical data. The conclusions drawn from this review are listed below:

1. The estimate of liquid radioactivity discharges (0.0252 Ci/yr exclusive of  ${}^{3}$ H) for 1 percent defective fuel and the statement that radioactivity concentrations in the discharge canal will be 0.002 percent of maximum permissible concentrations are, in our judgment, not adequately documented. Current PWR operating experience indicates that both will be considerably higher and the applicant has not presented new design information to support lower estimated discharges.

2. The environmental statement does not, but should, contain a commitment by the company to use all radioactive waste treatment and

holdup systems to their fullest capacity in order to keep discharges as low as practicable. In meeting this objective we believe the gaseous waste holdup capacity should be expanded to 60 days minimum.

3. The proposed technical specification for the site gaseous waste discharge limit would be excessive if calculated by the method indicated by the applicant. Discharge limits for the Indian Point facility should also be applied to Consolidated Edison Nuclear Units 4 and 5 if these additional units are built at the proposed location about 1500 meters south of the Indian Point site.

4. The environmental surveillance program for the facility would be adequate if modified to include TLD's with a minimum sensitivity of 5-10 mr/month and gamma spectroscopy of drinking water and Hudson River and lake water samples.

5. At this stage of the construction of the plant the only alternative action is not to operate it, a choice that is unreasonable in view of the minimal environmental effects expected. Therefore, with the qualifications stated in this report, we are of the opinion that Indian Point Nuclear Generating Unit 2 can be operated along with Unit 1 without any significant impact on the environment and with minimal risk to public health.

RADIOACTIVE WASTE DISPOSAL

Indian Point Units 1, 2, and 3 should be treated as a single facility in establishing discharge limits. Discharge limits set for the Indian

Point plant should also be applied to Consolidated Edison Nuclear Units 4 and 5 if these additional units are built. We consider the location of Units 4 and 5 as being at the same site since the radioactive waste discharges from these two plants will result in radiation exposure to the same population group. The two sites are only 1500 meters apart, and will discharge radioactive materials to the same water and air environment.

Estimates for gaseous releases from Indian Point Unit 2 are based on a 45-day holdup. We believe that this capacity should be expanded to 60 days and that the applicant should commit himself to utilize this capacity to its fullest extent at all times. A 60-day holdup time was selected to achieve a reduction of short-lived nuclides such as I-131 to essentially zero. The remainder of the waste disposal system should be utilized to its fullest capacity in order to keep both liquid and gaseous releases from the plant to as low a level as practicable. This position is taken because: 1) gaseous releases during normal operations at Indian Point Unit 1 have been much higher than at other similar operating PWR's which could be interpreted to indicate that gaseous waste holdup was not used to its fullest extent, (4,5) and 2) the potential expansion of nuclear capacity at this location warrants a full commitment to use all systems for each unit to their capacity to keep the cumulative population doses as low as practicable.

# RADIOACTIVE WASTE DISCHARGES

The applicant's estimate of liquid radioactive discharges indicates that with 1 percent defective fuel elements, a total of 0.0252 curies (exclusive of  ${}^{3}$ H) will be discharged annually. This estimate cannot be substantiated based on data available from present operating plants. According to AEC reports on 1969 waste discharges from licensed facilities, San Onofre, Indian Point 1, Connecticut Yankee, and Yankee-Rowe discharged 8, 28, 12, and 0.019 curies, respectively, of liquid wastes exclusive of  ${}^{3}$ H.<sup>(4)</sup> It is our understanding that none of these plants approached 1 percent defective fuel, and all of these PWR's operated at power levels much lower than that proposed for Indian Point Unit 2.

The Environmental Report estimates that liquid effluents at the point of discharge from Indian Point Unit 2 will be 0.002 percent of MPC. This appears to be underestimated even if the annual discharge estimates are assumed to be correct. Our estimates of liquid effluent levels are considerably higher.

The discussion of the gaseous discharge limit in the proposed technical specifications is not clear, and the equation for calculating the site limit appears to be incorrect. If the equation shown in the FSAR were used in calculating this limit, the resulting discharge limit would be too high. The equation should be modified to read as follows:

$$\Sigma_{u=1}^{u=3} \left[ f_u(\chi/Q)_u \times \Sigma \frac{R_i Q_{ui}}{MPC_i} \right] \le 1$$

where u = an index for each of the three units onsite

- $Q_{ui}$  = the average release rate from unit u of radioisotope i
  - $f_u$  = the fraction of the allowable site release limit assigned to unit u. For only units 1 and 2 operating the technical specifications assign  $f_1 = .1$ ,  $f_2 = .9$
- $R_i$  = a factor which accounts for reconcentration in the environs. For halogens and particulates with half-lives greater than 8 days  $R_i$  = 700, for all other radioisotopes  $R_i$  = 1

### ENVIRONMENTAL SURVEILLANCE

In general the operational surveillance program submitted by the applicant is adequate, however, it is suggested that a gamma scan be performed on all drinking, Hudson River, and lake water samples collected. In addition, <sup>3</sup>H measurements should be made on drinking water samples. The gamma scan is recommended because identification of radionuclides and determination of their individual concentrations is essential to the interpretation of environmental surveillance data in terms of population radiation exposure.

A minimum sensitivity of 1 mr/hr as proposed by the applicant for integrating dosimeters employed in the surveillance program is not feasible since during normal operation dose levels of this magnitude

would not be reached, nor is monthly collection of ionization chambers with an upper limit of 10 mr (this is probably the expected monthly background level). In order to avoid this problem we recommend the use of a TLD system with a minimum sensitivity of 5-10 mr/month.

### REFERENCES

- "Indian Point Nuclear Generating Unit 2--Final Facility Description and Safety Analysis Report," Vols. 1-4, Docket No. <u>50-247</u>, Public Document Room, U.S. Atomic Energy Commission, Washington, D.C., October 15, 1968.
- "Indian Point Nuclear Generating Unit 2 Technical Specifications," Ibid., July 1970.
- 3. "Applicant's Environmental Report--Operating License Stage," Ibid., August 6, 1970.
- Rogers, L.R. and C. Gamertsfelder, "U.S. Regulations for Control of Releases of Radioactivity to the Environment from Nuclear Facilities," Division of Radiation Protection Standards, U.S. Atomic Energy Commission, Washington, D.C., August 1970.
- Logsdon, J.E., R.I. Chissler, "Radioactive Waste Discharges to the Environment From Nuclear Power Facilities," BRH/DER 70-2, U.S. Department of Health, Education, and Welfare, Public Health Service, Environmental Health Service, Bureau of Radiological Health, Rockville, Maryland, March 1970.
- Goldman, Morton, Jr., "United States Experience in Management of Gaseous Wastes from Nuclear Power Stations," NUS Corporation, Rockville, Maryland, August 30, 1968.

\_20\_-

.

.

.

67 JULITIE

19

, all

Ś

-4

· ·

Dept of Health, Education &	-10-5-70	10-6	-70	3211	
Welfare. Washington, D. C. 2020	LTR. MEMO:	OTH	ORT:	OTHER:	
	1		1	<sup>1</sup>	
Harold L. Price	ACTION NECESSARY	CONCURRENC	E	DATE ANSWERED	
CLASSIF: POST OFFICE	FILE CODE: 50-247	(EN	VIRO EII	E	
DESCRIPTION: (Must Be Unclassified)	REFERRED TO	DATE	RE	CEIVED BY	DATE
following:	Muller/Blunt W/4 cys for ACT DISTRIBUTION:	10-14 ION (W/OF retu	-70 IG FOR M rned to	<u>ats)(0-1g t</u> 016)	o be
Public Health Review - Indian Point Nuclear Generating Unit 2	Regulatory F1 AEC PDR			·····	
	Henderson				
· · · · · · · · · · · · · · · · · · ·	Belton Shapar(OGC.Rm	P 506A)			
(1 cy rec'd)	DiNunno Boyd		DO NO	DT REMO	VE
REMARKS:	DeYoung E. Price. SLR		ACKNO	DWLEDGED	
	N. Dube P. Howe (2)			3211	
U.S. AT	MOTT 15/ SCHTOCO	MAI	L CONTRO		EC-326

U.S. GOVERNMENT PRINTING OFFICE: 1970-382-148

FROM	- House in a	CONTROL NUMBER 2850	
Porter and the second second			
Sceler C. Breberg		10/5/70	
ТО	•	ACTION PROCESSING DATES	INFORMATIONAL COPY DISTRIBUTION
		Acknowledged	
Harold L. Price		Interim Report	GMADASS
		Einel Meril	Dep. DirOGCSLR
			A. DRLML
	iginal 🦾 🔤 C	Lopy [] Other	REMARKS
Encl. Compents on en	1VITONMONTAL	report - Indian Point 2	
		المراجع	
Henderson f/action	10/16/70		
Cys: Rogars			
Cys: Logars Shapar Felton	-		
Cys: 20gers Shaper Felton Valeria			
Cys: 20gers Shaper Felton Valería			

COMMUNICATIONS CONTROL