Docket File

JUL 18 1972

Docket No. 50-247

ENVIRON, FILE (NEPA)

D. Muller, Assistant Director for Environmental Projects, L

INDIAN POINT NUCLEAR GENERATING PLANT, UNIT 2 - RESPONSE TO AGENCY COMMENTS ON DRAFT ENVIRONMENTAL STATEMENT

Name of Plant: Indian Point Nuclear Generating Plant, Unit 2
Licensing Stage: OL
Docket No.: 50-247
Responsible Branch: Environmental Projects Branch No. 1
Project Leader: M. J. Oestmann
Requested Completion Date: June 30, 1972
Applicant's Response Date: Not applicable
Description of Response: Response to agency comments on draft environmental statement
Review Status: Complete

In response to a request from G. W. Knighton, Chief, Environmental Projects Branch No. 1, dated June 23, 1972, the following responses are provided to the agency comments regarding the radioactive waste treatment systems described in Section III.E.2 of the DES. In view of additional information received from the applicant, we have revised portions of the radwaste system write-up which appeared in the DES. We recommend that the revisions setforth in the attached pages be used in the FES. We have also attached comments to be included in Chapter XII.

ENVIRONMENTAL PROTECTION AGENCY

Introduction and Conclusions

Item 3: Applicant should make full use of waste treatment system to achieve lowest practicable radioactivity releases.

Response: The Commission's Regulation 10 CFR 50.36a requires that the equipment installed in the radioactive waste treatment systems be maintained and used to control the releases of radioactive effluents as defined by the approved technical specifications.

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Detailed records of the waste system operation along with a semi-annual reporting of the operation to the AEC are required. Throughout the operating life of Unit 2, modification of the operating procedures and equipment utilization will be made to accommodate changing conditions of the reactor and the radioactive waste management systems.

Item 4: The proposed modifications of the waste treatment systems should be described in detail.

Response: Section III.E.2 (Radioactive Wastes) has been revised to include additional information regarding design, schedule, operation and performance of the modified waste treatment systems for Units 1 and 2.

Radioactive Waste Management: Clarification is requested regarding the steam generator blowdown treatment, and the gaseous waste treatment system.

Response: See above, Items 3 and 4.

STATE OF NEW YORK, DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Comment 32: Schedule and performance of the modified liquid waste treatment system was requested.

Response: The applicant is committed to complete the modification of this system before the end of the first fuel cycle in its testimony before the Atomic Safety and Licensing Board on July 13, 1971. Our evaluation indicates that its performance will be in accordance with 10 CFR 50.36a.

Comment 33: 1971 Data requested for Unit 1 radioactivity releases.

Response: Releases of radioactivity in liquid and gaseous effluents from Unit 1 for calendar year 1971 are shown in Table III-6 and III-8.

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Comment 34: Schedule for gaseous waste system modification requested.

Response: See Comment 32.

Original signed by:
R. W. Vollmer
for Robert L. Tedesco, Assistant Director
for Containment Safety
Directorate of Licensing

Encls:
1. Revised Section III.E.2
2. Chapter XII, Section A, Radioactive Waste

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ATTACHMENT I

Revised Section III.E.2, Draft Detailed Statement, Indian Point 2

2. Radioactive Wastes

The operation of a nuclear reactor results in the production of radioactive fission products, the bulk of which remain within the cladding of the fuel rods. During operation of the reactor, small amounts of fission products may escape from the fuel cladding into the primary coolant; also, some radioactive materials are produced as a result of neutron activation of corrosion products, of water, of dissolved chemicals, and air in the coolant. Some of these materials in low concentrations may be released into the atmosphere as gases or into the Hudson River to unrestricted areas as liquids by carefully controlled processes after appropriate treatment, monitoring, and sampling and analysis.

The radioactive waste treatment systems presently incorporated in the Indian Point Plant Unit No. 2 are described in the Final Facility Description and Safety Analysis Report (FFDSAR),[25] the applicant's Environmental Report, Supplement No. 1,[1] and Supplement No. 2.[2] The quantity of radioactivity that may be released to the environment during operation of both Units at full power will be in accordance with the Commission's regulations as set forth in 10 CFR Part 20 and 10 CFR 50.

Our evaluation of Unit No. 2 is based on the systems described in the

FFDSAR and assumes that 1) changes in the waste evaporator have been completed, 2) changes in the steam generator blowdown and ventilation systems will be completed before the end of the first refueling outage.

a. Liquid Wastes

The liquid waste system is designed to reduce radioactive materials in liquids discharged from the Indian Point Unit No. 2. The system is divided into three parts: the chemical and volume control system (CVCS), which will process radioactive water discharged from the reactor system; the waste disposal system, which will collect and treat liquids from the secondary loop including equipment and floor drains; and a collection system to handle liquid wastes from the laundry and showers.

(1) Chemical and Volume Control System

Two process systems are located within the CVCS of Unit No. 2 (Fig. III-13). The proper functioning of these systems will greatly reduce the burden placed upon the waste disposal system. Most of the radioisotopes present in the waste effluents originate in the reactor coolant.[26] To maintain a low level of radioactivity in the primary coolant a part of this coolant will be withdrawn to the CVCS and processed through one of two mixed-bed demineralizers to remove ionic impurities, fission products and corrosion products except cesium, yttrium, molybdenum and tritium. (These isotopes are removed slowly or not at all by the demineralizers and are assumed to pass through without any removal for the purpose of this analysis.) On an intermittent basis the effluent from the demineralizers will be processed through a second demineralizer to reduce all radioactive isotopes except tritium.[27] In the later stages of core life-time the coolant effluent from the mixed-bed demineralizers will be routed to one of two deborating demineralizers. The effluent from both demineralizers will be filtered and returned to the volume control tank for reuse, or sent to the holdup tanks for reuse after processing through the boric acid evaporator.

The second part of the CVCS will process liquids that drain from reactor coolant pump seals, accumulators, pressurizer relief tanks, and valve and flange leak-offs and the excess coolant let down during reactor startup. These liquids will be collected in one of three holdup tanks and processed on a batch basis. Liquid from one of the holdup tanks will be passed through one of four evaporator-feed cation demineralizers and will be filtered, degassed, and sent to a boric acid evaporator. The distillate from the evaporator will be processed through a demineralizer, filtered, and transferred to one of the three monitor tanks. The contents of the tanks will be sampled and analyzed. The system is provided with recycle capability if the monitor tank activity is above permissible discharge limits. If the quality of the distillate is such that it can be reused, it will be transferred to the primary coolant storage tank. The boric acid concentrate will be either reused or discarded to the batch tank in the waste disposal system and removed as solid waste. The values in Table III-4 are based on our assumed release of 4 primary system volumes per year and an over-all decontamination factor of 10^5 for the demineralizer-evaporator combination for all isotopes except iodine and tritium. A 10^3 D.F. for iodine was used.

(2) Waste Disposal System

The waste disposal system will process liquids from equipment drains and leaks, laboratory drains, decontamination drains, demineralizer regeneration, and floor drains as shown in Fig. III-14. These liquid wastes will be collected in a waste holdup tank and analyzed for radioactivity. Liquid wastes that require no further cleanup will be transferred to the waste condensate tank for monitored discharge into the Hudson River via the discharge canal. Liquids requiring further treatment will be processed in batches through a waste evaporator to the waste condensate tank. After sampling and analysis the condensate will be released to the discharge canal. Non-specification condensate will be either processed through a polishing demineralizer (not shown in Figure III-13) or returned to the waste holdup tank. The concentrates from the waste evaporator will be packaged as solid waste.

The applicant is planning to install a steam generator blowdown purification system which will process the blowdown from both

Unit No. 1 and Unit No. 2. This system will contain a flash tank, a filter, and a non-regenerable mixed-bed demineralizer. The demineralizer effluent will be monitored and released into the discharge canal. The present system contains a monitored blowdown tank which is vented to the atmosphere. Blowdown liquids are released without treatment to the discharge canal. The anticipated release from steam generator blowdown shown in Table III-4 is based on a continuous primary to secondary system leakage of 20 gpd and a 10 gpm steam generator blowdown.

The effluent from the Plant laundry and contaminated showers will be processed in the Unit 1 system. Laundry wastes are expected to be a minor source of radioactivity.

Based on our evaluation of the liquid waste systems for Unit 2, the radioactivity in the liquid discharged to the Hudson River was calculated to be approximately 40 Ci/yr excluding tritium for the initial system and a fraction of 5 Ci/yr excluding tritium for the modified system (see Tables III-4 and 5). However, to compensate for expected operational occurrences and equipment shutdowns the values for the modified system were normalized to 5 Ci/yr. Based on the operating experience of operating PWR type nuclear reactors the tritium release was estimated to be about 1000 Ci/yr. The applicant's estimated releases based on the modified waste system and a fuel leak of 0.5% of the full power operating fission product source term were 4200 Ci/yr of tritium and 0.025 Ci/yr for all other radionuclides.

TABLE III-4

ANTICIPATED ANNUAL RELEASE OF RADIOACTIVE MATERIAL IN LIQUID EFFLUENT FROM INDIAN POINT UNIT NO. 2 (INITIAL SYSTEM)

Nuclide	Steam Generator Blowdown (Ci/yr)	Chemical Volume Control System (Ci/yr)	Waste Disposal System (Ci/yr)
Rb-86	0.018	*	*
Sr-89	0.015		
Sr-90	0.0005		
Y-91	0.019		
Zr-95	0.002		
Nb-95	0.002		
Mo-99	5.51	0.005	0.018
Te-99m	0.61	0.004	0.016
Ru-103	0.002		
Te-127m	0.012		
Te-129m	0.11		
I-130	0.009	0.002	0.006
Te-131	0.031		
I-131	8.1	0.59	2.06
Te-132	0.62		0.002
I-132	0.12	0.056	0.19
I-133	3.46	0.56	1.92
Cs-134	7.1	0.004	
I-135	0.62	0.14	0.45
Cs-136	2.05	0.001	0.005
Cs-137	6.06	0.003	0.012
Ba-140	0.016		
Ca-140	0.003		
Ce-141	0.003		
Ce-144	0.002		
Pr-143	0.002		
Co-60	0.019		
Cr-51	0.018		
Mn-54	0.015		
Mn-56	0.045		
Fe-55	0.048		
Fe-59	0.019		
Co-58	0.47		
TOTAL	∿ 35	∿ 1.4	∿ 4.7

H-3 $\leq$ 1000 Ci/yr

* Isotopes with computed amounts less than 0.001 curies per year were not reported but are included in the total.

TABLE III-5

CALCULATED ANNUAL RELEASE OF RADIOACTIVITY IN LIQUID EFFLUENT
FROM INDIAN POINT NUCLEAR GENERATING PLANT UNIT NO. 2
(MODIFIED SYSTEM)

Nuclide	Ci/yr
Rb-86	.0033
Rb-88	.081
Sr-89	.00041
Sr-90	.000015
Sr-91	.00014
Y-90	.00011
Y-91m	.00074
Y-91	.033
Y-93	.00024
Zr-95	.000068
Zr-97	.000013
Nb-95	.000066
Nb-97m	.000013
Nb-97	.000015
Mo-99	.4
Tc-99m	.33
Ru-103	.000049
Ru-106	.000015
Rh-103m	.000049
Rh-105	.000015
Rh-106	.000015
Te-125m	.000041
Te-127m	.00032
Te-127	.00044
Te-129m	.0032
Te-129	.0021
Te-131m	.0012
Te-131	.00023
Te-123	.021
I-130	.0015
I-131	.89
I-132	.084
I-133	.48
I-135	.096
Cs-134	1.17
Cs-136	.48
Cs-137	.89
Ba-137m	.022
Ba-140	.00046
La-140	.00031

Nuclide	Ci/yr
Ce-141	.000075
Ce-143	.000024
Ce-144	.000043
Pr-143	.000060
Pr-144	.000043
Nd-147	.000024
Pm-147	.000006
Cr-51	.0012
Mn-54	.00043
Fe-55	.0013
Fe-59	.00041
Co-58	.012
Co-60	.0013
Np-239	.00039

Total ∿ 5 Ci/yr

H-3 ∿ 1000 Ci/yr

TABLE III-6

ANTICIPATED ANNUAL RELEASE OF RADIOACTIVE MATERIAL IN LIQUID EFFLUENT FROM INDIAN POINT UNIT NO. 1 (INITIAL SYSTEM)

ISOTOPE		Ci/Yr
I-131		15.5
I-132		1.01
I-133		6.56
I-134		0.79
I-135		3.53
Cs-137		0.41
Sr-89		0.05
Sr-90		0.01
Co-58		1.18
Co-60		0.49
F-18		3.38
Na-24		5.03
Cu-64		0.42
Mn-54		1.63
	Total	~ 40.00

H-3 1500 Ci/yr

TABLE III-7

SUMMARY OF LIQUID RADIOACTIVE RELEASES FROM INDIAN POINT UNIT NO. 1

Year	Activity Released[1] (Ci) H-3	Other	Total	Plant[2] Capacity Factor (%)
1962 (5 mo.)	--	0.13	0.13	28
1963	--	0.16	0.16	38
1964	--	13	13	25
1965	490	26	510	46
1966	130	43	170	50
1967	370	28	390	68
1968	800	35	830	65
1969	1100	28	1100	72
1970	410	7.8	420	14
1971	725	81	810	60

[1] U. S. Atomic Energy Commission, Division of Compliance, "Report of Inquiry into Allegations Concerning Operation of Indian Point 1 Plant of Consolidated Edison Company," Vol. II, October 1971.

[2] U. S. Atomic Energy Commission, Division of Reactor Development and Technology, "Operating History of U. S. Nuclear Power Reactors."

(3) Releases from Unit No. 1

The anticipated annual release of liquid radwastes from the initial system Unit No. 1 is given in Table III-6. At the present time the liquid wastes generated within Unit No. 1 are collected in 75,000 gallon tanks and released to the discharge canal after an additional delay of about 5 days. The amounts of radioactivity released from Unit No. 1 in the past have been reported in References (30-35); these are summarized for the years 1962-1971 in Table III-7.

(4) Combined Effluents from Unit No. 1 and Unit No. 2

The 40 curies per year expected to be released from Unit No. 1 and the 5 curies per year from Unit No. 2 will be diluted with an average of about 1 million gallons per minute flow of the circulating cooling water. If the blowdown release from Unit No. 2 is added to the other releases, then the annual releases from the Indian Point Station into the Hudson River are estimated to be 81 curies. When all Plant modifications become fully effective, this would be 10 Ci/year (see Table III-11).

b. Gaseous Waste

During operation of the facilities, radioactive materials released to the atmosphere in gaseous effluents include low concentrations of fission product noble gases (krypton and xenon), halogens (mostly iodines), tritium contained in water vapor and particulate material including both fission products and activated corrosion products.

The primary source of gaseous radioactive waste is from the degassing of the reactor coolant. This is principally from the exhaust of cover gas from waste holdup tanks, and the venting of the CVCS and other equipment. Additional sources of gaseous waste activity include the auxiliary building exhaust, the vent from the steam generator blowdown tank, the turbine building exhaust, the reactor building containment air and the condenser air ejectors. The gaseous waste system, shown for Unit No. 2 in Fig. III-15, contains a vent header which will collect radioactive gases vented from the various holdup tanks, pressure relief tanks and the CVCS. The gases will be compressed and stored in one of 4 large decay tanks. The control arrangement is such that 1 decay tank is filled at a time. When the fourth tank is being filled, the first tank will be emptied. Based on the evaluation of the applicant's data it appears that the 4 large decay tanks have sufficient capacity to permit a holdup time of 45 days at Unit No. 2, and up to 60 days in a separate but similar system at Unit No. 1. Prior to being released, the contents of each tank will be sampled and analyzed. The decision to discharge the gas to the Plant vent through high efficiency particulate air (HEPA) filters or to return it to the CVCS for reuse and additional decay will be based on the analysis of radioactivity level. Provisions have also been included for transferring gas between tanks. Besides the 4 large gas-decay tanks there are 6 smaller tanks. These tanks are reserved for use during degassing of the reactor coolant and purging of the volume control tank. The gas released from the decay tanks will be combined with ventilation air from the auxiliary building and discharged to atmosphere through the Plant vent. The discharge point for Unit No. 2 is about 193 feet above the building grade; for Unit No. 1 it is from about 10 feet above the top of the superheater stack, 255 feet above building grade.

The vapor from the steam generator blowdown will be vented directly to the atmosphere during the first fuel cycle. Following the first fuel cycle the steam generator will be tied into Unit 1. The vapor from the Unit 1 flash tank will go to the Unit 1 turbine condenser where the iodine will be scrubbed out. When Unit 1 is not operating the flash tank vapor will be released directly to the atmosphere through the existing roof vent. Based on the operating history of Unit 1 we assumed that the steam generator blowdown vapor from Unit 2 would be released directly 33% of the time.

The containment building, primary auxiliary building, and the fuel storage building are designed for handling of radioactive materials. The separate exhaust systems have also been designed to ensure that air flow is from areas of low potential to areas having a greater potential for accidental release of airborne activity. The atmosphere in the primary auxiliary building is discharged through prefilters and HEPA filters to the Plant vent. In addition, a fan has been provided for diluting the concentration of activity in the air discharged by the Plant vent system. Charcoal adsorbers are to be added to the containment and primary auxiliary building exhausts for iodine removal.

Following power operation it may be necessary to use the containment treatment system for pre-access cleanup during shutdown. The treatment system consists of a prefilter, HEPA filters and charcoal adsorber through which the containment air will be circulated. Prior to entry, the containment building atmosphere will be vented without further treatment through the containment purge exhaust system and discharged to the Plant vent. Air will be exhausted from the fuel storage building through a prefilter and HEPA filters prior to being released to the Plant vent. This system will be modified to add a charcoal adsorber for iodine removal.

Atmospheric discharges from the condenser air ejectors, which remove radioactive gases that have collected in the condenser as a result of primary to secondary leakage, will be continuously monitored and released without treatment through a vent stack located on the roof of the turbine building. Turbine building ventilation air will be discharged separately without treatment.

Staff estimates of the anticipated annual release of radioactive nuclides in the gaseous effluent, based on the radwaste systems described in the FFDSAR on Unit No. 2 and on existing equipment in Unit No. 1 are summarized in Table III-8. Table III-9 contains a summary of airborne radioactive releases from Indian Point Unit No. 1[3] and shows that essentially all of the iodine released to the atmosphere as gas is due to the blowdown. The staff's calculated release of 0.64 curies of iodine-131 per year exceeds the Technical Specification for Unit No. 2, which require that discharge of iodine-131 be less than 0.18 Ci/year.

In Supplement No. 1 to the Environmental Report dated September 9, 1971, the applicant described several proposed modifications to the gaseous waste system. The proposed changes include the installation of an iodine removal system (charcoal adsorbers) in the plant vent to reduce any gaseous release of radioiodine from containment purge or auxiliary building, and an intertie between Unit No. 2 and Unit No. 1 steam generator blowdown lines. As the result of these modifications the staff estimate of the gaseous releases of radioactivity from Unit 2 to the atmosphere are 2700 Ci/yr of noble gases and 0.18 Ci/yr of iodine 131 (see Table III-10). The combined releases from Units 1 and 2 will be 3900 Ci/yr of noble gases and 0.24 Ci/yr of iodine 131 (see Table III-11). Testimony presented by the applicant before the Atomic Safety and Licensing Board on July 13, 1971, committed that the proposed modifications will be completed by the end of the first fuel cycle.

c. Solid Wastes

Radioactive solid wastes will consist mainly of spent demineralizer resins, evaporator concentrates, and filters. Concentrates from the waste evaporator will be put into steel drums, and mixed with vermiculite and cement. Spent resins will be packaged the same way after "cooling" in the waste-resin storage tank for 1 to 6 months. The sluice water will be separated from the resin and returned to the waste holdup tank. Each drum will be stored in a shielded area prior to being shipped offsite. Miscellaneous solid wastes such as paper, rags, clothing, and glassware will be compressed in 55-gallon drums by a baler. The filled drums will be stored in a shielded area in the drumming room until shipped offsite. All solid waste will be packaged and shipped to a Federally-licensed burial ground in accordance with the Atomic Energy Commission's and Department of Transportation's regulations. Based on plants presently in operation, it is expected that approximately 300 drums of solid waste containing approximately 6000 Ci will be transported offsite each year from the modified systems. Details of transportation of wastes and their impact are discussed in Chapter V.F.

TABLE III-8

ANTICIPATED ANNUAL RELEASE OF RADIOACTIVE NUCLIDES IN GASEOUS EFFLUENT FROM INDIAN POINT UNITS NOS. 1 AND 2 (INITIAL SYSTEM)

Isotope	Discharge rate (Ci/year)				
	Unit No. 1	Unit No. 2			
	Total (60-day decay)	Containment purge	Gas processing system	Steam generator leak	Unit No. 2 total
Kr-85	180	13	790	2	800
Kr-87	2	0.04		3	3
Kr-88	6			10	10
Xe-131m	8	10	63	3	76
Xe-133	1000	1000	1500	680	3200
Xe-135	2	0.018		3	3
Xe-138	1	0.007		2	2
I-131	0.37	0.018		0.62	0.64*

*This release will be limited to 0.18 Ci/year by the Technical Specifications.

TABLE III-9

SUMMARY OF AIRBORNE RADIOACTIVE RELEASES FROM INDIAN POINT UNIT NO. 1

	Reported Releases*		
	Noble and Activation Gases (Ci)	Iodines and Particulates (Ci)	Plant Capacity Factor (%)
1962	--	--	28
1963	0.007	--	38
1964	13	--	25
1965	23	--	46
1966	56	--	50
1967	23	Neg.	68
1968	55	Neg.	65
1969	600	0.025	72
1970	1,800	0.075	14
1971	380	0.21	60

*The data for 1962 to 1966 were taken from the Semi-Annual Operating Reports of Consolidated Edison. The data for 1967 to 1970 were obtained from the Commission's Division of Compliance records.

TABLE III-10

CALCULATED ANNUAL RELEASE OF RADIOACTIVE NUCLIDES IN GASEOUS EFFLUENT FROM INDIAN POINT NUCLEAR GENERATING UNIT 2 (MODIFIED SYSTEM)

	Discharge Rate (Ci/year)					
			Gas Processing System	Steam Generator Leak		
Isotope	Containment Purge	Auxiliary Building	for 45-Day Decay[a/]	Air Ejector	Blowdown Tank Vent	Total
Kr-83m	[a/]	1	-	1	-	[illegible]
Kr-85m	-	6	-	6	-	12
Kr-85	2	1	870	1	-	870
Kr-87	-	3	-	3	-	6
Kr-88	-	11	-	11	-	22
Xe-131m	1	2	81	2	-	86
Xe-133m	-	9	-	9	-	18
Xe-133	88	530	470	530	-	1600
Xe-135m	-	1	-	1	-	2
Xe-135	-	17	-	17	-	34
Xe-137	-	1	-	1	-	2
Xe-138	-	2	-	2	-	4
Total Noble Gases	91	580	1500	580	-	2700
I-131	0.027	0.001	-	0.13	0.20[b/]	0.36[c/]
I-133	0.027	0.001	-	0.066	0.07	0.14

a/ - means less than 0.5 Ci of noble gas per year or less than 0.0005 Ci of iodine per year.

b/ - assumes 33% direct venting to the atmosphere; based on average plant factor for Unit 1 since 1967 omitting 1970. 67% passes through Unit 1 condenser.

c/ - release will be limited to 0.18 Ci/yr by Technical Specifications.

TABLE III-11

CALCULATED RADIOACTIVITY RELEASES IN EFFLUENTS FROM INDIAN POINT NUCLEAR GENERATING PLANTS UNITS 1 AND 2

Unit No.	Power (MWt)	Effluent Radioactivity (Ci/yr)			
		Liquids		Gases	
		Tritium	All Others	Noble Gases	Iodine 131
		Initial Process Basis			
1	615	1500	40	1200	0.37
2	3216	1000	41	4100	0.64*
Total		2500	81	5300	1.0
		Modified Process Basis			
1	615	1500	5	1200	0.06
2	3216	1000	5	2700	0.36*
Total		2500	10	3900	0.42

* Limited to 0.18 Ci/yr by the Technical Specifications.

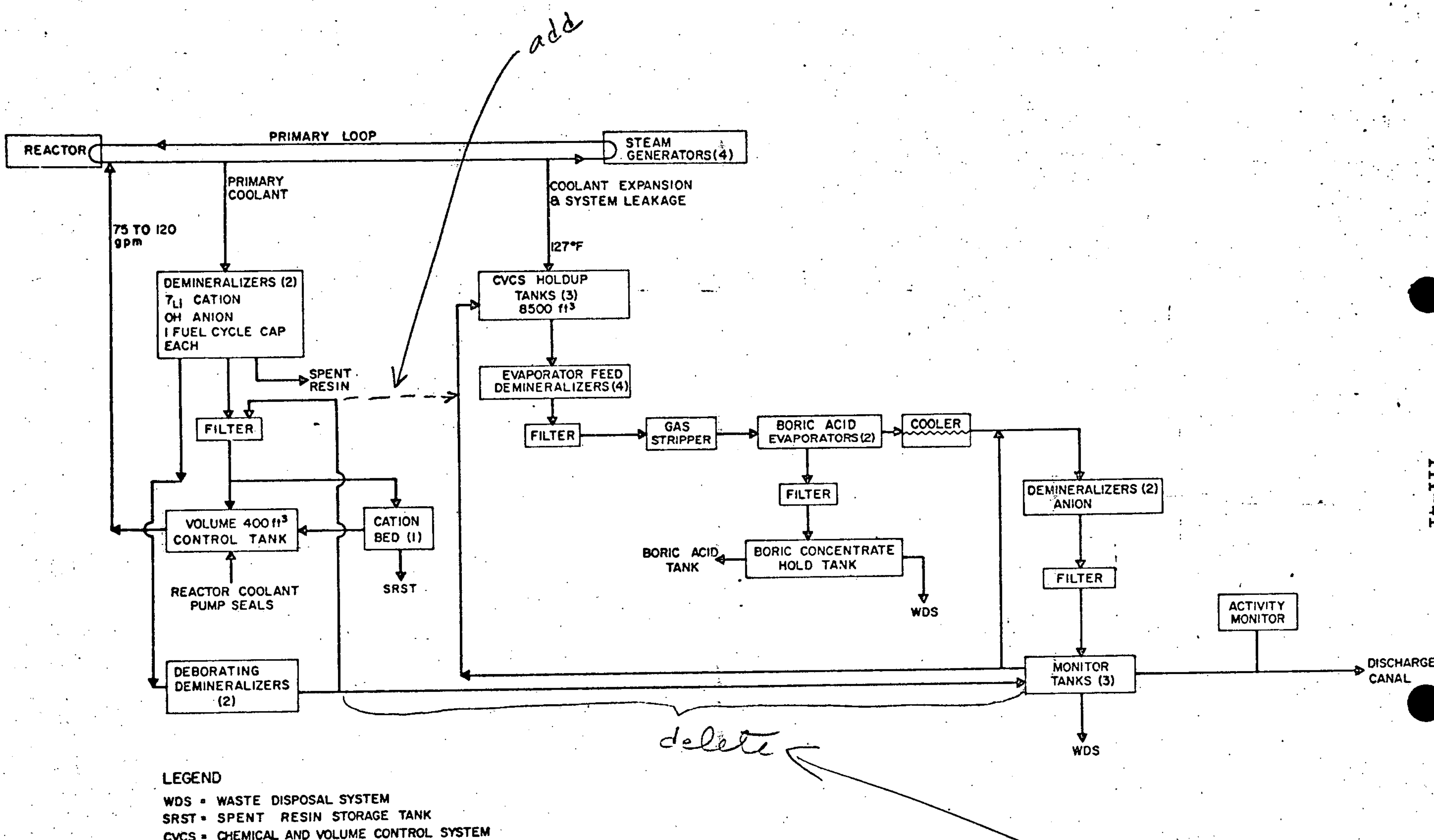

Fig. III-13

Primary Coolant Purfication in Chemical and Volume Control System. Indian Point Unit 2

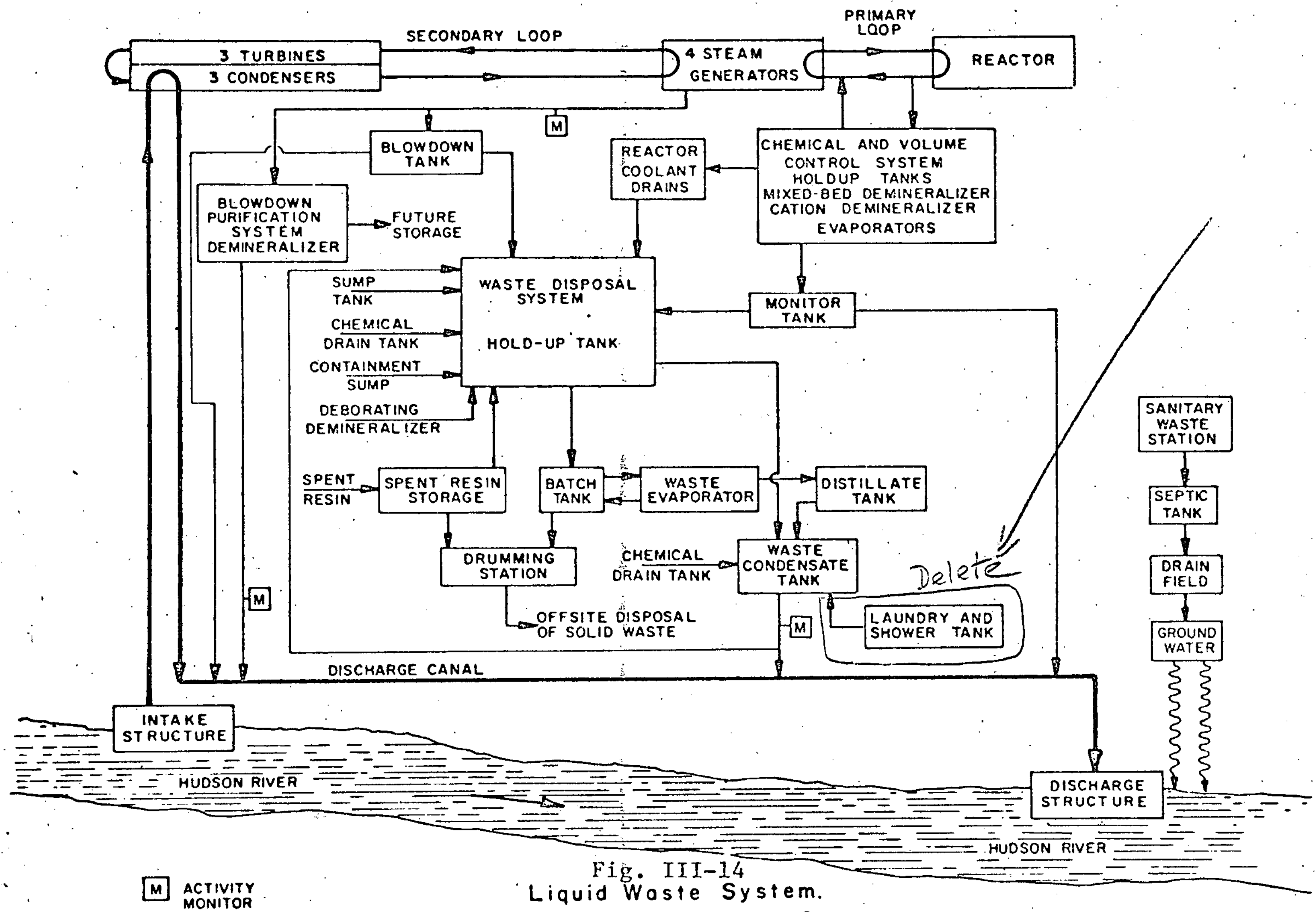

Fig. III-14
Liquid Waste System.
Indian Point Unit 2

ATTACHMENT 2

CHAPTER XII DISCUSSION OF COMMENTS RECEIVED ON THE DRAFT DETAILED STATEMENT ON ENVIRONMENTAL CONSIDERATIONS

A. Radioactive Wastes

The agency comments requested additional information regarding the waste system modifications, schedule and performance. Section III.E.2 of this report has been revised to include this information. The Commission's regulation 10 CFR 50.36a requires that the equipment installed in the radioactive waste treatment systems be maintained and used to control the releases of radioactive effluents as defined by the approved technical specifications.

H. Location of Principal Changes in This Statement in Response to Comments

Topics Comment Upon	Section Where Topics are Addressed
Modifications of Radwaste Systems	III.E.2 with added Tables III-5, 10 and 11