

FEB 4 1974

Project No. 50-286

D. R. Muller, Assistant Director for Environmental Projects, L

**RESPONSE TO AGENCY COMMENTS ON DES FOR INDIAN POINT 3**

Plant Name: Indian Point Number 3  
 Licensing Stage: OL  
 Project Number: 50-286  
 Responsible Branch: EPB #1  
 Project Leader: M. J. Oestmann  
 Requested Completion Date: February 1, 1974  
 Description of Response: Response to Agency Comments on DES  
 Review Status: Complete

Enclosed are our responses to EPA additional comments on the Indian Point Unit number 3 DES. These comments were received after the deadline for agency comments, and therefore were not included in our memo dated January 10, 1974.

*151*

Robert L. Tedesco, Assistant Director  
 for Containment Safety  
 Directorate of Licensing

Enclosure:  
 As stated

cc: w/o enclosure  
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Distribution  
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*Memo*

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DATE	2/1/74	2/4/74		

RESPONSES TO EPA ADDITIONAL COMMENTS ON INDIAN POINT 3 DES

1. According to the draft statement, the liquid effluents from steam generator blowdown will be released directly into the environment without treatment, if the blowdown contains activity below a predetermined value. The final statement should provide the criteria for such untreated discharges and should indicate if such untreated releases are taken into account in Table 5-6 of the draft statement.

The criteria for release of liquid effluents will be contained in the plant Technical Specifications, which will ensure that releases from the site are "as low as practicable". The Technical Specifications will be based on design objectives that limit the releases of radioactivity in liquid effluents to unrestricted areas to 5 Ci/yr per unit, and the dose or dose commitment to the total body or any organ of an individual in an unrestricted area to 5 mr/yr from the site.

2. Ventilation air from the turbine building, Unit 1 flash tank vapor (via Unit 1 roof vent) and Unit 3 flash tank vapor (via Unit 3 roof vent) will not be monitored. Also, it is not clear from the draft statement whether turbine building drains will be monitored. The final statement should discuss how AEC Safety Guide 21 criteria can be met without monitoring. If monitoring or sampling provisions are not to be included, the AEC should discuss in the final statement exactly how the radioactivity in the discharges

will be quantified , so that environmental dose assessments and station release records will reflect the total station impact on the environment. It appears that the Unit 3 flash tank vapor via the Unit 3 roof top vent is not accounted for in the list of radioiodine source terms in Table 5-9. This source term should be given in the final statement, and the dose evaluations correspondingly modified.

In a letter from G. W. Knighton, Chief, Environmental Projects Branch No. 1, Licensing, to Mr. William J. Cahill, Jr., Vice President, Consolidated Edison Company of New York, Inc., dated November 6, 1973, we have informed the applicant that the proposed effluent monitoring systems do not meet the requirements of Regulatory Guide 1.21 and General Design Criteria 64 of Appendix A of 10 CFR Part 50. The staff will require that all principal release points be identified and be monitored prior to startup of Indian Point No. 3.

In our evaluation of the proposed Secondary Boiler Blowdown Purification System (SBBPS), we considered that a 20 gpd primary to secondary leak was present continuously, and that the blowdown from unit number 3 was diverted to the unit number 1 blowdown flash tank (BFT). We also considered that Unit Number 1 would not be operating 33% of the time that the unit number 3 blowdown was being diverted to the SBBPS and, that as a result of the availability of the unit number 1 main condenser for venting the BFT, we calculated an I-131 release of 0.16 Ci/yr from the BFT vent. We consider this mode of operation to be limiting.

3. On Page 5-121 in the draft statement, the AEC states that the ventilation air from the fuel storage buildings will be treated by a charcoal adsorber only if the radioactivity in the air is above a preset value. The specific criteria for utilizing the charcoal adsorber should be given in the final statement.

The criteria for utilizing the charcoal adsorber in the fuel storage building ventilation system and all other effluent treatment systems will be contained in the plant Technical Specifications, and will ensure that releases from the plant are "as low as practicable". The Technical Specifications will be based on design objectives that limit the quantity of I-131 to be released in gaseous effluents so that the dose to the whole body or critical organ of an individual in an unrestricted area from all pathways of exposure will not exceed 15 millirems/yr.