

POWER AUTHORITY OF THE STATE OF NEW YORK
INDIAN POINT NO. 3 NUCLEAR POWER PLANT

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TELEPHONE: 914-739-8200



September 6, 1978
IP-JJK-2520

Hilbert W. Crocker, Acting Chief
Fuel Facility and Materials Safety Branch
U.S. Nuclear Regulatory Commission
Region I
631 Park Ave.
King of Prussia, Penna. 19406

Dear Mr. Crocker:

This letter is provided in response to your letter of August 16, 1978 received at this office on August 18, 1978 concerning Inspection 50-286/78-21 conducted by Mr. L. Thonus of your office on July 12-14 and 24-28, 1978 of Indian Point 3 with operating license DPR-64.

I would first like to address Item 1 of the Notice of Violation attached to your letter. The Environmental Technical Specifications for Indian Point 1, 2 and 3 were issued on December 12, 1975. Section 2.4.1.a (sic) addressed in your inspection letter states "the concentrations of radioactive materials released in liquid wastes from all reactors at the site shall not exceed the values specified in 10CFR20, Appendix B, Table II, Column 2, for unrestricted areas." This section was assumed to provide for annual time averaging as allowed by 10CFR20.106(a) which states "A licensee shall not possess, use, or transfer licensed material so as to release to an unrestricted area radioactive materials in concentrations which exceed the limits specified in Appendix 'B' Table II of this part,.... For purposes of this section concentrations may be averaged over a period not greater than one year." Sections 2.4.1.b through 2.4.1.h of the Technical Specifications assure that plant releases will be maintained far below the limits of 10CFR20 and in full compliance with Appendix I to 10CFR50. Plant administrative controls detailed in AP-11 Rev. 1 assure that releases of liquid waste comply with all of these requirements and also are maintained less than or equal to 1×10^{-7} uCi/cc. The concentration of the liquid discharge of June 7, 1978 addressed in your letter was 9×10^{-10} uCi/cc. An isotopic analysis of the liquid discharged demonstrated that it could have been released at a concentration of 7×10^{-6} uCi/cc and still comply on an "instantaneous" basis with concentration requirements in 10CFR20.

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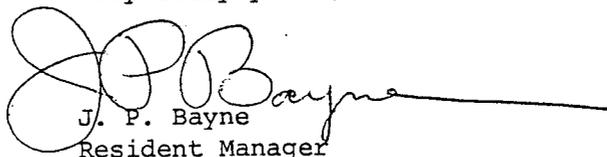
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It is impractical to establish an alarm set point for the R-18 monitor that will assure "instantaneous" compliance with 10CFR20 concentration limits under all possible plant operating conditions. Modification of the liquid waste processing system to assure "instantaneous" compliance at all times would involve a considerable expense with no significant reduction in radiation releases.

In our opinion 10CFR20.106(a) allows us to "average over a period not greater than one year" the permissible discharge concentration to assure compliance with ETS sections 2.4.1.a. This interpretation is consistent with both previous versions of the Technical Specifications for Indian Point approved by NRC and with Appendix I to 10CFR50.

With respect to Item 2 of the Notice of Violation attached to the subject letter, the R-18 monitor, during the period described, had successfully passed monthly functional checks required by ETS section 3.4.1.f and records showed that it had also passed all instrument checks required to be performed under ETS 3.4.1.f. We agree that a required quarterly calibration with NBS traceable radioactive sources had not been satisfactorily completed. The monitor was subsequently calibrated with an NBS traceable sample in August, 1978 and the calibration factor was found to be within ten percent of the previously measured values. In the future if the required calibrations are not completed during a particular quarter the subject monitor will be removed from service until the required calibration is completed.

Very truly yours,


J. P. Bayne
Resident Manager

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cc: Director of Nuclear Reactor Regulation
Attn: Mr. William McDonald, Director (3 copies)
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U. S. Nuclear Regulatory Commission
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