

Indian Point 3
Nuclear Power Plant
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William A. Josiger
Resident Manager

June 23, 1986
IP3-WAJ-036Z
IP3-JAS-041B

Docket No. 50-286
License No. DPR-64

Mr. Thomas T. Martin, Director
Division of Radiation Safety and Safeguards
U. S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA. 19406

SUBJECT: INSPECTION NO. 50-286/86-09

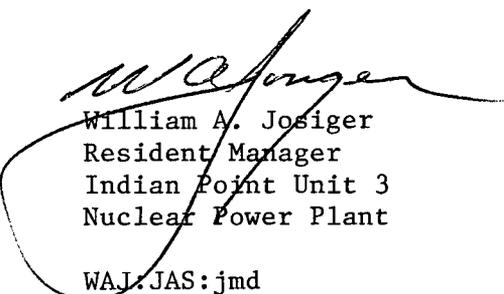
Dear Mr. Martin:

This letter provides the Authority's response to your Inspection Report No. 50-286/86-09 dated May 23, 1986 and received at this office June 2, 1986.

Attachment I to this letter addresses the concerns cited in Appendix A, Notice of Violation, of the Inspection Report.

Should you or your staff have any questions concerning this matter please contact Mr. John A. Schivera of my staff.

Sincerely,



William A. Josiger
Resident Manager
Indian Point Unit 3
Nuclear Power Plant

WAJ:JAS:jmd

Attachment

cc: IP3 Resident Inspectors' Office

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ATTACHMENT I

VIOLATION

Section 6.8.1a of Appendix A to Facility Operating License DPR-64, Technical Specifications, requires that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972. Regulatory Guide 1.33, November, 1972, requires procedures to determine the concentration and species of radioactivity in liquids and gases prior to release, including representative sampling, validity of calibration techniques, and adequacy of analyses. In addition, Section 3.3.1 of Appendix B to Facility Operating License DPR-64, Environmental Technical Specifications Part II - Radiological Environmental, requires that tritium analyses be performed on liquid effluents. Procedure No. RE-CA-102, Determination of Tritium in Water, written pursuant to the above requirements requires the distillation of samples for tritium analyses when gamma emitters are present in the samples.

Contrary to the above requirements, tritium analyses were performed on liquid effluent samples for 1985 and 1986 to date without distillation as required by the procedure.

RESPONSE

The Authority concurs with the violation. More specifically the violation was the result of not revising the precaution and limitation section of a procedure based on a technical evaluation.

Immediately after being notified of this issue by the NRC inspector, distillation of liquid waste effluent samples prior to tritium analyses was reinstated. This action was completed on April 18, 1986.

The need or requirement to distill a liquid waste sample prior to analysis for tritium has been under consideration by the Authority for several years. An informal technical evaluation of this issue had been conducted. The results of this evaluation showed that direct analysis of tritium without distillation could be performed provided certain initial conditions were met. The results of this study were apparently informally incorporated into the conditions for analysis. As noted in the inspection report, the technical aspects of this issue were discussed with the inspector and the Authority will continue to distill samples in accordance with the procedure in effect at the time of the inspection.

A review and evaluation of liquid effluent release records was performed for the period of 1985 and 1986. The data for the beta energy channel of the liquid scintillation counter used to determine tritium content indicates that analyses without distillation did not significantly affect the accuracy of results. Based on this review, no revision or updates are necessary for Indian Point 3 semi-annual effluent reports for 1985 or results for 1986 to date and were conservative in regards to the levels of tritium reported.