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

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May 21, 1980 IP-JJK-8763

Boyce H. Grier, Director Office of Inspection and Enforcement Region I U.S. Nuclear Regulatory Commission 631 Park Ave. King of Prussia, PA 19406

Dear Mr. Grier:

This letter is being provided for information only and concerns activities at Indian Point 3 relating to the site Environmental Technical Specifications.

Section 2.3.3.1 of Appendix B to the facility Operating License states "chemical discharges shall not exceed... the amount listed in Table 2.3-2... at the confluence."

Section 2.3.2.3 States "Deviations after 24 hours from the limits... in Table 2.3-2... shall be promptly reported in accordance with Section 5.6.2.1.a."

Table 2.3-2 describes anticipated maximum sustained release (pounds/day) for boric acid to be 600 each for Units 1,2 and 3.

Memorandum of Understanding No. 15 in Section I.E. "Sharing of Discharge Limits" states "one party may allocate unused portions of its chemical discharges for a period of time to allow the other party to use the full site dilution flow or a specified portion there of for a chemical discharge when necessary."

Boric acid releases on a unit basis may have exceeded anticipated values Table 2.3-2 but site releases were well within these values on the followibg dates:

DATE	UNIT 1	UNIT 2	UNIT 3
<del>2/22</del> /80	0	29	651
2/23/80	0	11	611
2/24/80	0	29	657
2/25/80	0	11	651
2/26/80	. 0	86	697
4/1/80	0	11	771
800529044/2/80	0	11	617

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The boron releases in February resulted from steam generator blowdown during the 50 ppm boron soak of the steam generators at reduced power to initiate the EPRI and Westinghouse sponsored program for steam generator treatment to reduce corrosion rates.

The high boron concentrations combined with high blow down rates necessitated by condenser leaks and a requirement to keep steam generator chemistry within specifications resulted in larger than expected boron discharges. This situation is not expected to be repeated.

In April the boron discharges from blowdown were 55 pounds for April 1 and the same for April 2. The remainder of the boron on these dates was discharged in processed liquid waste. This liquid waste had been processed through an ion exchanger which removes radioactivity while allowing boric acid to pass through. Boric acid discharges hve been within unit limits for all other days to date and have always been within the site values in Table 2.3-2. Plant personnel have also intiated new administrative controls to assure that boric acid releases stay within the 600 pound per day limit in the future.

There are no adverse environmental impacts from these boric acid discharges. During this period of the year the Hudson River averages approximately 0.2 ppm boron naturally present in sea salt and this addition becomes undetectable against the natural background. This background level results in more than 10 pounds of boric acid per minute passing through the discharge canal with about 0.5 pounds per minute daily average added to this background flow during the dates identified above. At all times releases have been less than 0.1 ppm in compliance with Environmental Technical Specification requirements.

We feel that these releases were within site Technical Specification limits and this letter has been provided to inform you of the details of these releases.

Sincerely,

J. P. Bayne Resident Manager

JJK:dp

cc: Director of Nuclear Reactor Regulation
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