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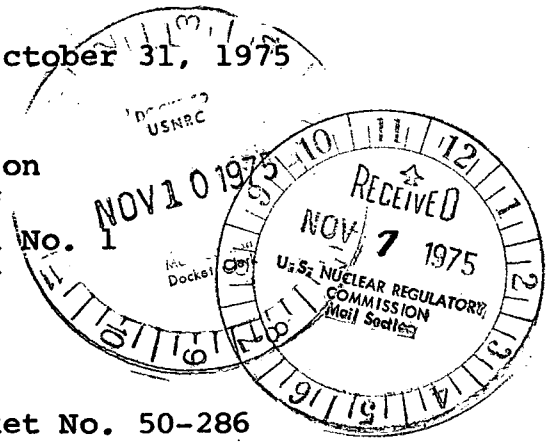
Regulatory Docket File

October 31, 1975



Director of Nuclear Reactor Regulation
ATTN: Mr. George W. Knighton, Chief
Environmental Projects Branch No. 1
Division of Reactor Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Indian Point 3 - Docket No. 50-286

Dear Mr. Knighton:

In accordance with your request, I enclose 6 copies of a list of Con Edison's suggested changes to the draft of the Environmental Technical Specifications you enclosed with your letter dated October 8, 1975. You requested this list as a preliminary to a meeting.

I tried to keep the "Justifications" brief and we would welcome the opportunity to discuss these with you. I will call you next week to discuss the scheduling of a meeting.

Sincerely,

Edward J. Sack

Edward J. Sack

EJS:ld
Enc.
cc: Harry H. Voigt, Esq.
Sarah Chasis, Esq.
C. John Clemente, Esq.
James P. Corcoran, Esq.
Joseph Gallo, Esq.
Nicholas A. Robinson, Esq.

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Reference	Change Requested	Justification
1) Page 1-1 § 1.3.4 Line 1	Change "will" to "is likely to".	It is not possible to be absolutely certain a voltage reduction will occur until the instant it is instituted.
2) Page 2.1-1 General - Line 2	After "emergency" insert "or an emergency need for power,".	There appears to be no reason to distinguish this emergency condition from the others.
3) Page 2.1-3 § 2.1.1.1(g)	Add new subsection as follows: "The limits specified in this section may be exceeded not more than 10% of the time during the operating year." or "The limits specified in this section may be exceeded if one or more of the circulating water pumps is down for maintenance or pump outage."	It is not possible to specify all possible limits without unreasonably restricting operations. Other limiting conditions adequately cover thermal discharges. EPA in its NPDES permit has adopted the first alternative suggested as a solution to this problem. If that is not acceptable, the second alternative is essential because pump outage is only provided for with respect to one operating mode while it is possible under all operating modes.
4) Page 2.1-11 § 3.1.4.1 Line 8	Delete "one half".	It is improper to require reporting of an event which is well within the limiting conditions of operation.
5) Page 2.3-2 § 2.3.1.2 2nd sentence	This sentence should be deleted.	The two sentences of this section both say the same thing.
6) Page 2.3-2 § 3.3.1.2	Change "2.3.1.1" to "3.3.1.1".	Apparent typographical error.
7) Page 2.3-8 § 3.3.3.1 Last paragraph	Insert at end "when used".	It is not intended to use these chemicals constantly.

	Reference	Change Requested	Justification
8)	Page 2.3-9 § 2.3.3 2nd paragraph, line 4	Delete sentence beginning "Discharges".	It is not proper for a specification to be so general.
9)	Page 2.3-9 § 3.3.3	Delete last paragraph.	It is not proper for a specification to be so general.
10)	Page 2.3-13 § 2.3.3 Line 2	Delete "not more than" and insert "about".	The number is not a legal limit but the approximate average of the fuel used.
11)	Page 2.3-17 Lines 1-3	The first three chemicals listed should only be analyzed when used.	It is not intended to use these chemicals constantly.
12)	Page 2.4-3 § 3.4.1.c Lines 7-8	Change date for installation to "prior to completion of first Indian Point Unit No. 3 refueling outage".	More time is required to implement changes.
13)	Pages 2.4-3 and 2.4-4 § 3.4.1.d Lines 6,7,8	Delete requirement for "two independent samples" and for "two plant personnel" to independently check valving.	One of each is sufficient.
14)	Page 2.4-4 § 3.4.1.h Line 7	Change date for installation to "prior to completion of first Indian Point Unit No. 3 refueling outage".	More time is required to implement changes.

	Reference	Change Requested	Justification
15)	Page 2.4-4 § 3.4.1.g Line 3	Reword 2nd sentence as follows: "Whenever the monitors are inoperable, the blowdown shall be continuously sampled, and analyzed at least once per watch".	NRC spec will produce unnecessarily more spent resin and require more offsite shipments.
16)	Page 2.4-4 § 3.4.1.h Line 2	Delete requirement to have continuous flow measurement device and recorder.	Not consistent with Spec. 3.4.1.e. NRC Staff has agreed to manual verification of flow.
17)	Page 2.4-7 Bases 2nd full paragraph	Reword last sentence of paragraph concerning Spec. 2.4.1.f as follows: "In order to keep releases of radioactive materials as low as practicable, this specification requires operation of all waste treatment equipment which could significantly reduce effluent activity whenever it appears . . . any calendar quarter."	Clarification of Spec. 2.4.1.f. Waste equipment should be operated only when activity will be reduced.
18)	[Comment deleted.]		
19)	Page 2.4-9 § 3.4.2.b Lines 2-4	Delete rest of sentence after "months".	Since plant vents are monitored continuously for both activity and volumetric flow, it is unnecessary to check damper positions at such a frequency.
20)	[Comment deleted]		

	Reference	Change Requested	Justification
21)	Page 2.4-12 § 2.4.2.e Line 2	Change curie limit to 15,000 curies.	B-dose reduction in outer skin layer was not considered.
22)	Page 2.4-23 Table 2.4-3	Delete requirement for sampling of "Chemical Waste Sample"	Equipment of this designation does not exist in any of the Units at Indian Point.
23)	Page 2.4-23 Table 2.4-3	Delete requirement for a liquid high level alarm for Turbine Building Sumps (Floor Drains).	There are no such sumps.
24)	Page 2.4-23 Table 2.4-3	Delete requirement for monitor on service water discharge pipe. If not deleted, require that the continuous monitor be in service after September 1, 1976.	Usefulness of such a monitor is limited; all possible direct pathways of radioactivity into this pipe are already monitored.
25)	Page 2.4-24 Table 2.4-4	SG Blowdown Tank Vent has a continuous monitor.	Clarification.
26)	[Comment deleted.]		
27)	Page 2.4-24 Table 2.4-4	Waste Gas Storage Tanks entry: Add footnote indicating these items will be installed prior to completion of first IP-3 refueling outage.	Alarm, auto control and monitor on IP-1 tanks will require additional time for installation. The suggested time period is the same as requested for Spec. 3.4.1.c and 3.4.1.h.

	Reference	Change Requested	Justification
28)	Page 4.1-2 § 4.1.1.a.2 Line 1	Delete "when ice is on the river" and insert "during the months of December through March".	The presence of ice on the river varies greatly and these surveys must be planned well in advance. Inclement and hazardous weather and limited daylight also preclude surveys.
29)	Page 4.1-2 § 4.1.1.a.2 Line 2	Delete "(1976)".	It now appears that Indian Point 3 will not be in operation for the full calendar year 1976.
30)	Page 4.1-2 § 4.1.1.a.3 Line 2	Delete "(1976)".	It now appears that Indian Point 3 will not be in operation for the full calendar year 1976.
31)	Page 4.1-2 § 4.1.1.a.3 Line 3	Change "October 1, 1975" to "February 1, 1976".	The October date is already past.
32)	Page 4.1-2 § 4.1.1.a.3 Line 9	Sentence beginning on this line should be rewritten: "To the extent possible, surveys shall be made when the power plants have been operating at high power loads before each survey starts."	Phrasing implies that plants are operated to conduct surveys. Intent of this sentence is to adjust scheduling of surveys to the extent possible. Also, it is not clear what a sufficient length of time is in this context
33)	Page 4.1-4 § 4.1.1.a.4 2nd paragraph line 4	Change "90 days" to "twelve months".	The 90-day requirement for the intensive survey is not feasible in view of the extensive data required.

	Reference	Change Requested	Justification
34)	Page 4.1-4 § 4.1.1.a.4 2nd paragraph line 3	Change "intensive" to "routine".	Clarification.
35)	Page 4.1.4 § 4.1.1.a.4 2nd paragraph last line	"Part E" should be "Part D".	Apparent typographical error.
36)	Page 4.1-10 § 4.1.2.a(1)A (iii) Lines 6 & 7	Delete sentence beginning with "The" and the sentence beginning with "Statistically" and insert: "The number of striped bass, white perch and tomcod shall be determined. Average length and weight for these three species shall be determined using statiscally appropriate subsampling. numbers by length classification shall be determined from statistically appropriate subsampling for all other species."	This is the present procedure being followe and changing at this point is unnecessary. Since population studies are limited to key species, this type of data on other species is unnecessary. Statistically appropriate subsampling techniques can yield sufficiently reliable data, without the need for counting or measuring each fish caught.
37)	Page 4.1-11 § 4.1.2.a(1)A (iii) Last paragraph, 1st sentence	Should read "Numbers per 1000 m^3 shall be determined for white perch and Atlantic tomcod. Numbers of each life stage per 1000 m^3 shall be determined for striped bass."	This specification must be made consistent with the specifications identified in Section 4.1.2.a(2)A. Paragraph 2, and also to be consistent with the specification identified in Section 4.1.2.a(4)A(1)d. Further to comply with the specification as presently worded would cause a substantial and unnecessary expansion in the study program, including changes in the sampling program. In addition,

Reference	Change Requested	Justification
37) cont'd		ice and weather conditions would make sampling for tomcod early life stages extremely hazardous to the safety and health of field personnel
38) Page 4.1-11 § 4.1.2.a(1)B 2nd paragraph Line 1 - Line 3 -	Delete "or changed". Delete "laboratory techniques and data analysis".	Improvements in laboratory techniques (such as sorting of samples, quality control and identification of organisms) and analytical procedures (such as statistical analysis, computer programs and methods of determining dissolved oxygen concentration) should be allowed to assure that the study program reflects advances in the state of the art rather than being held up for extensive regulatory review.
39) Page 4.1-13 § 4.1.2.a(2)A Lines 2-6	Sentence beginning "For" should be deleted. Next sentence should begin "If practicable". Delete "at least at one intake forebay" through "if practicable".	Two years of entrainment sampling during Unit 2 operation have been completed. The need for comparative sampling at Unit 2 seems unjustified because NRC Staff has said that results are not applicable to assessing the entrainment impact of Unit 3. Further, comparative sampling at Unit 2 will substantially increase the study program and will result in increased amounts of time necessary to collect, process and analyze the entrainment data.
40) Page 4.1-14 § 4.1.2.a(2)B 2nd paragraph	Same as No. 37.	Same as No. 37.

Reference	Change Requested	Justification
41) Page 4.1-15 § 4.1.2.a(3)A(i) Line 3	Delete sentence beginning "The".	It is inappropriate for a specification to require an estimate. Also, it is impossible for an observer to estimate the number of fish which do not enter the forebay when the fixed screens are washed because of the wash spray which impairs visibility, the turbidity of the water and the dispersion of the fish amid the debris washed from the screen. Further, it is not possible to identify the various species when observing from the top of the intake structure. The Licensee is investigating the loss of these fish in an attempt to develop appropriate means for estimating the number of uncollected impinged fish.
42) Page 4.1-15 § 4.1.2.a(3)A(i) Line 6-7	End of line should read "a pump out of operation".	A pump may continue to operate after a unit is taken out of commercial operation.
43) Page 4.1-17 § 4.1.2.a(3)B 2nd paragraph	Same as No. 37.	Same as No. 37.
44) Page 4.1-18 § 4.1.2.a(3)(b) Line 4	Delete "by screen".	No purpose is served by reporting by screen.
45) Page 4.1-18 § 4.1.2.a(3)(b) Line 6	Delete section after "specification".	Same as No. 40.

Reference	Change Requested	Justification
46) Page 4.1-18 § 4.1.2.a(3)(d) Line 1	Change "18th" to "24th".	In assessing the ecological significance of fish impingement, it is necessary to use data from spring recaptures which are obtained through June of the following year. These data are collected through the end of the 18th month and can be analyzed and reported by the 24th month.
47) Page 4.1-21 § 4.1.2.a(4)A(3) Line 1-2	Delete "and white perch larvae" and "and white perch".	This specification implies that a white perch life cycle model is being developed. The only modelling effort is one for striped bass. The determination of "f factors" for white perch is unnecessary for the scope of the present studies.
48) Page 4.1-22 § 4.1.2.a(4)D	Same as No. 37.	Same as No. 37.
49) Page 4.1-22 § 4.1.2.a(4) Last paragraph on page - 3rd line	Delete "within 6 months after completion of each annual study effort" and insert ". Progress reports shall be submitted in accordance with § 5.6.1.2."	Referenced section requires progress reports. The study reports will be submitted upon completion.
50) Page 4.1-28 § II.B(1) Line 3	Delete "natural".	If a change is accounted for by an environmental fluctuation, it is irrelevant whether the fluctuation was natural or man-made.

	Reference	Change Requested	Justification
51)	Page 4.2-7 Table 4.2-1 Item 18	Delete Item 18.	This analysis for I-131 is not possible.
52)	Page 4.2-10 Table 4.2-3 Item 3	Change "0.05" to "5.0".	This is the appropriate value.
53)	Page 4.2-11 Table 4.2-3 Item 13	Change "0.05" to "5.0".	This is the appropriate value.
54)	Page 5.1-3 § 5.1.1.5	Insert new section: "Any change in the organization and responsibilities described in this section shall be reported to the Director of Nuclear Reactor Regulation within 30 days and the implementation of any such change shall not be deemed a violation of an environmental technical specification."	This section may prohibit a change in management indicated in Figure 5.1-1 without prior NRC approval. This is an improper regulation and should be amended to permit changes with appropriate notice to the Commission.

	Reference	Change Requested	Justification
55)	Page 5.1-4 § 5.1.2.4.c Line 1	Change "funciton" to "function".	Apparent typographical error.
56)	Page 5.1-6 § 5.1.2.7g	Change "violations of the ETSR" to "nonroutine reportable environmental occurrences".	Intent of the specification.
57)	Page 5.2-1 § 5.2.4 Line 7	After "EPC" insert "or NFSC (as appropriate)".	Some actions are properly reviewed by the NFSC.
58)	Page 5.4-1 § 5.4.2 Lines 2-6	Delete balance of paragraph beginning with "Such".	Procedures should be implemented as soon as possible. EPC should have an audit function not an approval function.
59)	Page 5.6-1 § 5.6.1.1 Lines 7-12	Delete beginning "and" through "problem".	The suggested deletion refers to the reports which are included in § 5.6.1.2.A. It is more appropriate that they be covered there. This type of analysis cannot be prepared within 90 days.
60)	Page 5.6-3 § 5.6.1.1 Line 4	Delete sentence beginning "The period" and insert "The period of the first report shall begin on date of initial criticality of Unit No. 3."	It now appears that Unit No. 3 will not go critical until after January 1, 1975.

	Reference	Change Requested	Justification
61)	Page 5.6-4 § 5.6.1.2 Last paragraph	The paragraph beginning "All reports" should be deleted.	The NRC and the State require substantially similar material in somewhat different format. If the requested filings are made, the NRC will merely duplicate data already received in the form specifically required by the ETSR. This is unnecessary duplication of paper which Congress has asked regulatory agencies to avoid.
62)	Page 5.6-5 § 5.6.B Line 5	Delete "as outlined in Regulatory Guide 1.21" and insert "under the format of Appendix B of Regulatory Guide 1.21".	The Guide is not a requirement.
63)	Page 5.6-5 § 5.6.B 2nd paragraph, line 2	After "quarter", revise as follows: "with data summarized on a quarterly basis following the format of Appendix B of Regulatory Guide 1.21."	The Guide is not a requirement.
64)	Page 5.6-5 § 5.6.2.1 Lines 3-6	Delete "or" through "operation".	This is phrased too ambiguously to be a specification. A licensee should know with precision whether or not a report is required.

50-247/286

Law Department
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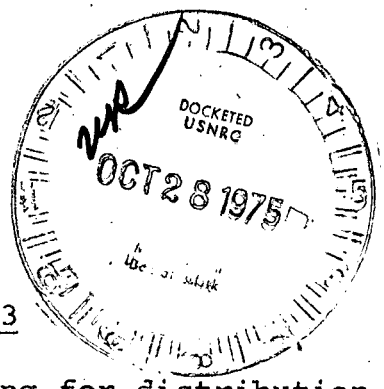
4 Irving Place, New York, N Y 10003

October 22, 1975



Director of Nuclear Reactor Regulation
ATTN: Mr. George W. Knighton, Chief
Environmental Projects Branch No. 1
Division of Reactor Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir: Re: Indian Point 2 and 3

In accordance with our understanding for distribution of research reports, I enclose six copies of each of the following reports with the distribution indicated on Attachment A:

1) Report prepared by Texas Instruments Incorporated entitled "Final Report of the Synoptic Subpopulation Analysis, Phase I: Report on the Feasibility of Using Innate Tags to Identify Striped Bass (Morone saxatilis) From Various Spawning Rivers" - September 1975

2) Report of Stone & Webster Engineering Corporation entitled "First Progress Report Indian Point Flume Study" - August 1975

Very truly yours,

Edward J. Sack

Edward J. Sack

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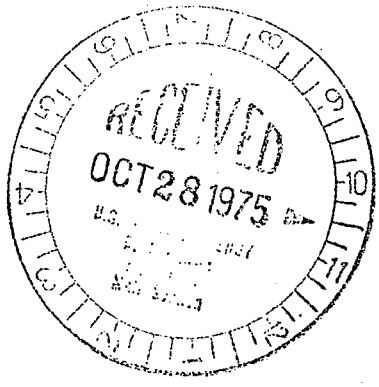

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Attachment A

Distribution

copies

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Vice President

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Telephone (212) 460-3819

Regulatory File Cy.

September 12, 1975

Re Indian Point Unit Nos. 1, 2 & 3
Docket Nos. 50-3, 50-247 & 50-286

Mr. George W. Knighton, Chief
Environmental Projects Branch No. 1
Division of Reactor Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Knighton

Your letter dated August 20, 1975 requested certain information as follows:

1. Status of installation of the intertie from Unit No. 3 to the Unit No. 1 secondary boiler blowdown purification system (SBBPS). This system has been installed.

2. Status of installation of charcoal adsorbers in the Unit No. 3 containment purge duct. These are 95% installed and completion is expected by September 30, 1975.

3. Status of installation of charcoal adsorbers in the Unit No. 3 primary auxiliary building. These are 95% installed and completion is expected by September 30, 1975.

4. Status of installation of charcoal adsorbers in the fuel storage building ventilation systems. These have been installed.

5. Your understanding that the steam generator blowdown intertie between Unit No. 2 and Unit No. 1 has been installed is correct.

6. With respect to our plans for the evaporator, it is our intention to provide an Integrated Liquid Waste Handling System (ILWHS) to serve all three Indian Point Units. This system will supplement the existing

waste evaporators and the Secondary Boiler Blowdown Purification System (SBBPS). It is expected that this system will be operational in the Spring of 1976.

The ILWHS will consist of two 25 gpm package waste evaporators, interties from the Unit 2 and 3 liquid waste systems to the 25 gpm evaporators, and the steam generator blowdown interties from Units 2 and 3 to the Unit 1 SBBPS which are already installed. The system has been designed with sufficient capacity to process all forms of radioactive liquid waste produced by all three units. It is intended that the two 25 gpm evaporators be operated as a redundant system. Also, in the unlikely case that both SBBPS demineralizers are out of service, the blowdown could be routed to the Unit 1 Waste Collection Tanks (WCT) and treated as normal liquid waste.

7. Conversion to all volatile treatment of the steam generator feedwater did not involve any modification of the steam generator blowdown system or the steam generator blowdown treatment system. The conversion merely consisted of discontinuing the injection of sodium phosphate into the feedwater. No new demineralizers were added and there were no changes in release points of potentially radioactive materials to the environment.

Very truly yours

William J. Cahill, Jr.
Vice President

mrb