RECORD #212

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TITLE: ...Dissolved Noble Gases in Liquid Effluents and Compliance With Tech Spec. 3.11.1

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## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

## JUN 1 2 1987

MEMORANDUM FOR:

Frederick J. Hebdon, Chief Inspection, Licensing and Research Integration Branch Program Management, Policy Development and Analysis Staff, NRR

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FROM:

LeMoine J. Cunningham, Acting Chief Radiation Protection Branch Division of Radiation Protection and Emergency Preparedness

SUBJECT:

HEALTH PHYSICS POSITION CONCERNING THE ROLE OF DISSOLVED NOBLE GASES IN LIQUID EFFLUENTS AND COMPLIANCE WITH TECHNICAL SPECIFICATION 3.11.1

Standard Technical Specification 3.11.1 states:

The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (See Figure 5.1-3) shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 200 picocuries/ml total activity.

In response to an inquiry from a licensee, RPB said that the staff does not consider Part 20, Appendix B to give limits for noble gases in water. Specifically, the footnotes addressing "nuclides not listed above" do not apply to the noble gases because the noble gases are listed.

Multiple Addressees

RPB also said that the technical specification limit for noble gases is independent of the concentrations of other nuclides. That is, if noble gas concentration does not exceed 200 pCi/ml and the concentrations of other nuclides do not add up to more than one MPC equivalent, the LCO is satisfied. There is no need to include the noble gases in the Part 20 summation formula.

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These are NRR interpretations of long standing. Since the questions did arise again, it seems worthwhile to call them to your attention and to add the information to the "Health Physics Positions" data file.

LeMoine J. Cunningham, Acting Chief Radiation Protection Branch Division of Radiation Protection and Emergency Preparedness

