

Klementowicz, Stephen

From: Taylor, Kevin [Kevin.Taylor@aecom.com]
Sent: Tuesday, May 25, 2010 11:37 AM
To: Klementowicz, Stephen
Subject: RE: Question on Effluent Report dose

Effluent activity did not drop. Only the dose decreased. Total curies released actually went up from 2007 to 2008.

I agree there is not issue with the dose, compliance, etc. I will drop it.

Kevin Taylor, PE, CHP
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From: Klementowicz, Stephen [<mailto:Stephen.Klementowicz@nrc.gov>]
Sent: Tuesday, May 25, 2010 11:05 AM
To: Taylor, Kevin
Subject: RE: Question on Effluent Report dose

Sorry, but I do not agree. A dramatic drop in effluents is a good thing and does not require an explanation in the SEIS. As long as the doses meet the NRC's ALARA criteria and there is no indication that doses are ramping up and approaching the NRC's dose limits, there is no issues here. The doses and their effluent release program is performing in accordance with NRC requirements.

The SEIS is an extension of the GEIS. The GEIS concluded generically that all plants meets NRC dose limits for effluents and are ALARA. If a plant's effluent program and calculated doses show an increase that is likely to exceed NRC dose limits, then that warrants a discussion.

The NRC's inspection program looks into the details of the licensee's program and looks at specific changes and what the licensee is doing. The SEIS does not go into that level of detail.

If you want to put in a brief discussion about the low effluents/doses for that year, go ahead. But the point is that the doses are well within NRC limits and that there are year to year variations in effluents based on outage or non-outage cycles and operational issues. If there is no adverse trend where doses are going up, then state that there is no adverse trend.

Steve K

From: Taylor, Kevin [<mailto:Kevin.Taylor@aecom.com>]
Sent: Tuesday, May 25, 2010 10:54 AM
To: Klementowicz, Stephen
Subject: RE: Question on Effluent Report dose

Yes they are low and I agree with your assessment that it is the insignificant dose that is the important issue. However, such a dramatic drop (three orders of magnitude) suggests a change in the way they were calculating or presenting the dose. If I were an intervener, this is something I would question.

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From: Klementowicz, Stephen [<mailto:Stephen.Klementowicz@nrc.gov>]
Sent: Tuesday, May 25, 2010 10:30 AM
To: Taylor, Kevin
Subject: RE: Question on Effluent Report dose

As a category 1 issue and since the amounts went down, this is not a problem. If the values went up significantly and were close to having the dose exceed NRC dose limits, then I would be concerned.

The focus of the review is to see if there is an adverse trend that would cause the effluents and resultant dose to exceed the NRC dose limits over the license renewal term. A cycle of up and down is typical and generally reflects refueling outage or non-refueling outage years or other work. As long as the doses are low and there is no new and significant info that puts their doses outside NRC's limits, the issue is not significant. If the doses are within the ALARA dose criteria in Appendix I to 10 CFR Part 50, then it is not an issue. The doses are ALARA and no additional dose reduction by a licensee is required. The GEIS made its generic conclusion based on the doses being within NRC limits.

The draft words I sent you for Chapter 4 include the discussion about variations in the effluents and doses from year to year. The use of the most recent dose data shows that the doses are well within NRC limits, and the conclusions of the GEIS remain valid (the impacts are small).

I have several priority issues to finish, so I do not plan to look at the Salem effluent report.

Steve K

From: Taylor, Kevin [<mailto:Kevin.Taylor@aecom.com>]
Sent: Tuesday, May 25, 2010 10:17 AM
To: Klementowicz, Stephen
Cc: Spangler, Nicole
Subject: Question on Effluent Report dose

Stephen:

There is a significant decrease in the Salem liquid effluent dose from 2007 (and prior years) to 2008 shown in graph on page 19 of the *2009 Annual Radioactive Effluent Release Report*. There is no explanation given in the *2008 Annual Radioactive Effluent Release Report*. I also, looked at the 2007 report and I can't quite figure out where the doses on the graph come from. Can you take look at this and see what you think?

Thanks.

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