



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

JUN 30 1993

Mr. Thomas E. Tipton
Vice President and Director
Operations, Management and
Support Services Division
Nuclear Management and
Resources Council
1776 Eye St. N.W., Suite 300
Washington, D.C. 20006

Dear Mr. Tipton:

This letter is in response to your April 28, 1993, letter to me which asked for NRC review and confirmation of your position that continued use of Appendix B to 10 CFR 20.1 - 20.601 as the appropriate reference contained in Technical Specifications dealing with instantaneous release rates for effluents is acceptable to the NRC staff after implementation of the revised Part 20.

After careful review of your position and other relevant factors, we have determined that it is acceptable to the staff for licensees to retain their existing level of effluent control as implementing the ALARA requirement after January 1, 1994, without submitting individual requests for amending their technical specifications to comply with new 10 CFR 20.1101(b). Therefore, the instantaneous release rate limits, which are specified by reference to the values in Appendix B, will continue to be the values in Appendix B prior to the revision, until the technical specifications are changed.

As you know, we are preparing a Generic Letter to provide model Technical Specification wording to ensure conformance with the revised Part 20 requirements. We will include a discussion on the acceptability of your position in the Generic Letter. The proposed Generic Letter will provide that Part 50 licensees will not have to submit a request for amendment of the Technical Specifications before January 1, 1994, in order to retain their existing level of control for effluents. Licensees may devote their attention and time to ensure adequate preparations for implementation of the revised Part 20 requirements on January 1, 1994. However, we consider this approach a temporary situation since many of the current Technical Specifications contain wording, particularly in the Basis section, that could cause confusion and some of the definitions are not entirely consistent with those in the revised Part 20. The model changes for Technical Specifications that will be in the Generic Letter are intended to eliminate possible confusion or improper implementation of revised Part 20 requirements. Therefore, we assume that licensees will want to adopt the model Technical Specification wording after the work of initially implementing the revised Part 20 is over.

Thomas E. Tipton

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We believe our position on this issue adequately satisfies your concerns for the efficient use of industry resources while maintaining the current level of protection of public health and safety. If you have any questions regarding this matter, please call Frank Congel at 504-1088.

Sincerely,
Original Signed by
Thomas E. Murley

Thomas E. Murley, Director
Office of Nuclear Reactor Regulation