

January 12, 1990

Docket No. 50-255  
Serial No. PAL 90-002

Mr. Kenneth W. Berry  
Director, Nuclear Licensing  
Consumers Power Company  
1945 West Parnall Road  
Jackson, Michigan 49201

Dear Mr. Berry:

SUBJECT: PALISADES PLANT - REQUEST TO RETAIN SOIL IN ACCORDANCE WITH  
10 CFR 20.302 (TAC NO. 67408)

By letters dated November 12, 1987 and January 25, 1988, Consumers Power Company requested authorization under the provisions of 10 CFR 20.302 to dispose contaminated soil in place. The NRC staff replied with a request for additional information which was forwarded to you on March 15, 1988. You provided a response to that request for information in letter dated June 27, 1988.

By letter dated June 27, 1988, Consumers Power Company provided additional information in response to our request. However, in that response, CPCo expanded the original request to include the entire South Radwaste area as a contingency against future spread of contamination and to obviate the need for additional requests under 10 CFR 20.302. For the staff to complete its review of this request, additional specific information is required. This is because NRC approval under 10 CFR 20.302 is for the disposal of specifically identified and characterized slightly contaminated material by the applicant.

We request that you provide a revised submittal describing the licensed material for disposal and the analysis and evaluation called for under 10 CFR 20.302. The attached request for additional information provides additional detail for the content of the revised submittal.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance under PL 96-511 is not required.

Sincerely,

Original signed by

Albert W. De Agazio, Project Manager  
Project Directorate III-1  
Division of Reactor Projects - III,  
IV, V & Special Projects  
Office of Nuclear Reactor Regulation

cc:  
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*Handwritten signatures and initials:*  
- A large signature, possibly "Ade Agazio"  
- "JF01"  
- "AA/3"  
- "11"



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

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Sincerely,

A handwritten signature in cursive script, reading "Albert W. De Agazio, Sr.".

Albert W. De Agazio, Sr. Project Manager  
Project Directorate III-1  
Division of Reactor Projects - III,  
IV, V & Special Projects  
Office of Nuclear Reactor Regulation

cc: See next page

Mr. Kenneth W. Berry  
Consumers Power Company

Palisades Plant

cc:

M. I. Miller, Esquire  
Sidley & Austin  
54th Floor  
One First National Plaza  
Chicago, Illinois 60603

Nuclear Facilities and  
Environmental Monitoring  
Section Office  
Division of Radiological  
Health  
P.O. Box 30035  
Lansing, Michigan 48909

Mr. Thomas A. McNish, Secretary  
Consumers Power Company  
212 West Michigan Avenue  
Jackson, Michigan 49201

Judd L. Bacon, Esquire  
Consumers Power Company  
212 West Michigan Avenue  
Jackson, Michigan 49201

Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Jerry Sarno  
Township Supervisor  
Covert Township  
36197 M-140 Highway  
Covert, Michigan 49043

Office of the Governor  
Room 1 - Capitol Building  
Lansing, Michigan 48913

Mr. Gerald B. Slade  
Plant General Manager  
Palisades Plant  
27780 Blue Star Memorial Hwy.  
Covert, Michigan 49043

Resident Inspector  
c/o U.S. Nuclear Regulatory Commission  
Palisades Plant  
27782 Blue Star Memorial Hwy.  
Covert, Michigan 49043

SECOND REQUEST FOR ADDITIONAL INFORMATION (RAI)  
ON THE CONSUMERS POWER COMPANY  
PALISADES PLANT REQUEST  
TO RETAIN SOIL IN ACCORDANCE  
WITH 10 CFR 20.302

The subject request submitted by Consumers Power Company (licensee) by letter dated November 12, 1987 and supplemented by information forwarded by letter dated January 25, 1988 contained detailed information evaluating the radiation doses via the liquid pathways for very low levels of contamination presently in areas of soil near the Palisades Plant South Radwaste Building. Detailed evaluations were also presented of potential occupational doses from this contaminated soil.

Three significant questions arose during the staff evaluation of this request:

1. The inhalation pathway for doses from the contaminated soil was not addressed.
2. The proposals contain no delineation of the specific contaminated areas covered by the disposal request.
3. The licensee's Technical Specifications for radiological environmental monitoring require an LLD of  $2 \times 10^{-7}$   $\mu\text{Ci/gm}$  for  $^{137}\text{Cs}$  determinations in sediment - yet all of the measurements reported in the request were made with equipment 5 to 10 times less sensitive for these gamma radiations.

By letter dated June 27, 1988 the licensee submitted additional information in response to the staff's RAI of March 15, 1988. This submittal was unacceptable in that it addressed potentially contaminated areas and hypothetical maximum contamination parameters rather than measured licensed material to be disposed of under the regulations.

It is requested that the licensee submit a complete, revised 20.302 request incorporating the dose evaluation information of the measured contamination considered in the November 12, 1987 and January 25, 1988 submissions and updated if appropriate with dose evaluations of the inhalation pathway based on the same measured contamination. As part of the proposal the licensee should record exactly what areas of measured contamination are covered by the request for which disposal under 10 CFR 20.302 is proposed.