sampling in the cooling channels and assessment of food-chain concentration factors, as well as radiation doses from shoreline and water of the channels (FES, pages V-56 and -57).

Your response on revised proposed Technical Specifications should also cover these additional points.

It is recognized that use of the proposed environmental limits on operation of the Turkey Point Units 3 and 4 may need to be modified in light of implementing actions taken under the Federal Water Pollution Control Act.

Sincerely,

Original signed by
George W. Knighton

George W. Knighton, Chief
Environmental Projects Branch No. 1
Directorate of Licensing

cc: Mr. Jack Newman
Newman & Reis
1100 Connecticut Avenue, NW
Washington, D. C. 20036

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See previous yellow for concurrences

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MAR 29 1973

Docket No. 50-250

Florida Power & Light Company
ATTN: Dr. James Coughlin
Senior Vice President
P. O. Box 3100
Miami, Florida 33101

Gentlemen:

This letter is in confirmation of the discussions held with Mr. Orin Pearson and others of your staff relative to the visit of Mr. Richard Cleveland of this office to the Turkey Point site on February 13, 1973 concerning the proposed Environmental Technical Specifications for Turkey Point Units 3 and 4 and the progress of the construction and testing program for the cooling channel system. We are in basic agreement with the majority of your proposals for limits on operations, monitoring of discharges, and surveillance of environmental conditions and changes. We understand you are proceeding to develop a revised set of proposed Technical Specifications. The following changes should be covered in this revision:

1. The Environmental Technical Specifications should be prepared as an Appendix B to the licenses. Format should follow the outline of (1) Definitions, (2) Protection Conditions, (3) Monitoring Requirements, (4) Surveillance and Special Study Programs, and (5) Administrative Requirements. Bases should be included for (2), (3), and (4). The administrative section should provide for review and audit of the environmental program, action on violations of Technical Specifications, establishment of operating procedures for the environmental program, reporting requirements, and records retention.

2. An operating limit for salinity in discharge water should be specified (not to exceed 110% of the ambient salinity in the receiving water and not to exceed 44 parts per thousand).

3. Turbidity limits should be specified. We feel operations and construction should not be causing discharges with turbidity more than 10 Jackson Turbidity Units greater than that of the receiving water. Even at this level, we have observed at Turkey Point there can be a marked degradation in the visual quality of the receiving waters, and average discharge levels should be well below this value.

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4. Temperature should be measured for intake cooling water.

5. Chemical measurements should be done for cooling water at the intake, prior to exiting Lake Warren, and at the discharge from the canals.

6. Records should be maintained of chlorine and all other raw treatment chemicals used in plant unit operations or added directly to water pumped through the licensed facilities.

7. Turbidity should be measured at intake and at canal mouths either hourly or via a daily continuous composite sample.

8. The FPL study program submitted October 7, 1972 in response to recommendations 7b and 7c of the AEC's Final Environmental Statement on Turkey Point Units 3 and 4 (July 1972) should be incorporated into part (4) of the Technical Specifications. A study of effects of turbid discharges should be included.

9. Provision should be made to reflect the changes in operating mode as tests and operations are conducted with a recirculating cooling system.

The revised proposed Technical Specifications are needed by April 6, 1973. Since the above revisions were discussed in detail on February 13, 1973, with your staff, and a marked-up draft copy of our proposed changes furnished to your staff after this meeting, we feel this target should be attainable. If you cannot meet this target, please inform this office at once, with an alternate date by which the Technical Specifications can be submitted.

We wish to confirm that Conditions 3.B and 4 of License No. DPR-31 for Turkey Point Unit 3, relating to submittal of proposed Technical Specifications and proposed surveillance programs and of a report of survey and evaluation of impacts on the terrestrial environment have been satisfied, except for the following points. The proposed Technical Specifications do not yet include a limit on the salinity of discharge water. The proposed study program does not specifically address itself to considerations of marine environmental impacts of the once-through cooling alternatives described in Section X of the AEC's July 1972 Final Environmental Statement (FES). It also does not address specifically impacts of ground water seepage from the channel system on the mangrove and shoreline ecosystems or development of predictive models to relate the mangrove ecosystem to the marine ecosystems (FES, page V-56). It also does not address specifically the performance of additional radiological

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sampling in the cooling channels and assessment of food-chain concentration factors, as well as radiation doses from shoreline and water of the channels (FES, pages V-56 and -57).

Your response on revised proposed Technical Specifications should also cover these additional points.

Sincerely

George W. Knighton, Chief
Environmental Projects Branch No. 1
Directorate of Licensing

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