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Socket No. 50-300

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MEMORANDUM TO: H. Silver, Project Manager, Light Water Reactors
Branch #4, ORM

FROM: G. B. Zwetzig, Project Manager, Operating Reactors
Branch #4, ORM

SUBJECT: COMMENTS ON TMI-2 DRAFT ENVIRONMENTAL TECHNICAL
SPECIFICATIONS (NON-RADIOLOGICAL) DATED MAY 31, 1977

Enclosed are my comments on the subject document. If the author has
problems incorporating any of the comments it is requested that he
contact me so that we can discuss the matter.

G. B. Zwetzig, Project Manager
Operating Reactors Branch #4
Division of Operating Reactors

POOR ORIGINAL

OFFICE	ORB#4: DOR	C-DBT#4: DOR			
ATTENTION	GZwetzig:dn	RWReid			
DATE	8/1/77	8/2/77			

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COMMENTS ON TMI-2 DRAFT ENVIRONMENTAL

TECHNICAL SPECIFICATIONS (NON-RADIOLOGICAL) DATED 5/31/77

No.	Page	Section	Line	Comment
1	8	3.1.A	6-8	Acceptance criteria for termination of biological and field water quality monitoring programs should be included in the appropriate sections. This will allow reviewer (several years later) to determine if it is O.K. to terminate.
2	9	3.1.1.a(1)	6, 7	Delete "As a minimum".
3			8	Change "twtemperature" to "temperature".
4			9	Change first "frequency" to "date and time"; change second "frequency" to "date".
5			14	What is criterion for termination of program?
6			1	If TMI-2 is like TMI-1, the condenser cooling water is not discharged to the river - rather it goes to a cooling tower. Specification should be on temperature of intake and discharge water from Unit 2 or the Station, not on condenser outlet temperature.
7	13	3.1.1.a(2)	2nd par.	What is criterion for termination of program?
8	15	3.1.1.a(3)	2nd par.	- ditto - plus wherever it occurs at other places.
9	34	3.1.2.b(1)	2nd par. line 3	Where is Table 5.6-15? Is it part of the ETS?
10	34	3.1.2.b(1)	line 7	What will Regional Director of I&E do with pictures? I would think they would be sent to NRR.
11	36	4.1	3rd par.	I question the value of these four studies because the results may be strongly affected by the river water temperature and the chlorine demand at the time of the survey. To what use will the studies be put? I believe experience with TMI-1 shows that it is difficult to exceed 0.1 ppm in the discharge.

No.	Page	Section	Line	Comment
12	34	3.1.2.b(1)	1st para. line	Change to read: This surveillance program shall commence at initial attainment of normal operation of Unit 2 and shall be continued for at least 5 years. At the end of 5 years the licensee may request modification or termination of this requirement per Section 5.7.1.
13	38	4.2	5th para.	Same as comment 12 except 2 years instead of 5. Note: The point of comments 12 and 13 is that the NRC should not be put in the position of automatically initiating a review - rather, if the licensee wants the program terminated, he should request it.
14	40	4.3	2nd para. line 3	Should delete 2 years and state criteria for when desired information has been obtained. Will licensee determine when desired info has been obtained?
15	41	4.4		I do not think this inspection can be justified on basis of TMI-2 licensing unless new transmission lines have been constructed for TMI-2. Otherwise, it appears to be a backfit on TMI-1.
16	43	4.5	2nd para.	Criteria for terminating program should be defined. Why don't we let the state or county worry about this. Same comment applies to Section 4.4.
17	48	4.7		I think unusual erosion and herbicide events could be covered under this section.
18	51	5.2		Change to read: "The Metropolitan Edison Company organization responsible for performing environmental monitoring activities and for reviewing and auditing such activities, as defined in Sections 5.1 and 5.3, is shown in Figure 5.2-1.

No.	Page	Section	Line	Comments
19	54	5.4	13	Change to read "comply with the requirements set forth in the currently applicable 401 certification issued by the Pennsylvania Department of Environmental Resources. Revisions to the certification will be reported in accordance..." <u>Reason:</u> We do not want to be required to issue a change to the ETS every time PaDER changes the certification - especially when we do not have much say in it.
20	55	5.5	1	delete "document that has been".
21			3	change "detailed programs" to "procedures".
22			7	delete "program".
23		5.5.1	1/2	delete "descriptions of the".
24			5	Change "fully detailed descriptions" to "specification".
25	57	5.5.2		Sentence is too long and not clear. Perhaps a listing would clarify.
26		5.5.3		This section does not impose any requirement - and therefore should not be included.
27	58	5.5.4.A	2	To be analogous to 10 CFR 50.59, should omit reference to FES-OL. Also should omit reference to FES-OL since licensee did not commit to FES-OL, he committed to Environmental Report he submitted.
28			7	Delete reference to "objectives of the ETS" since these are only rarely stated. Or provide clear statement of the objective of each requirement.
29	58	5.5.4.B	3	Before "increased" insert "significantly (>10%)
30		5.5.4.C	2	Change "the Subsection" to "this Subsection".
31	59		3	Same as comment 30.
32			7	Same as comment 28.

No.	Page	Section	Line	Comments
33	61	5.6.1		Questions: What is supposed to be done with these annual environmental reports? Is someone supposed to review them? If so, who? How is DOR Project Manager advised of acceptability of report? Or are reports simply filed for the record and for future reference?
34				Deleted
35	62	5.6.2.a		As far as I can see the only events requiring a prompt report are "unusual or Important Events" per Section 4.7. I suggest we reference Section 4.7 in Section 5.6.2.a to provide a definition of events requiring prompt reporting.
36	64	5.7.2	4	Delete "or becomes aware of" Licensee cannot be responsible for actions of others. He already has to send us copies of changes he receives officially. He should not be responsible for notifying us of things that others are doing that are not yet official. General Questions: Who is supposed to look at these submittals? How is DOR Project Manager advised of acceptability of change? What is NRC responsibility with regard to these changes? What do we do if we do not agree with them?
37	8	3.1	2	Need definition for "onset of normal operation".
38			3, 4	Delete "and continue...these ETS." This phrase occurs repeatedly throughout the ETS and is not needed since Section 5.7.1 tells them how to terminate program.
39			8, 9	This last sentence is place to reference Section 5.7.1 and 10 CFR 50.90.
40	9	3.1.1.a(1)	1	Need definition for "normal operation".
41			3	Sentence describing "purposes" should be basis.
42			29 para line 2	Delete "and continue until....Subsection 5.7.1."