



SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, Box 15830, Sacramento, California 95813; (916) 452-3211

November 20, 1979

Director of Nuclear Reactor Regulation
Attn: Mr. Robert W. Reid, Chief
Operating Reactors, Branch 4
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket No. 50-312
40 CFR Part 190
Environmental Radiation Protection
Standards for Nuclear Power Operations
Rancho Seco Nuclear Generating Station
Unit No. 1

Dear Mr. Reid:

Your letter of September 17, 1979, requested that we explain how we intend to demonstrate to the NRC conformance with the provisions of the EPA Uranium Fuel Cycle Standard (40 CFR 190) until such time as the Radiological Effluent Technical Specifications (RETS) are issued.

In response to your request, Sacramento Municipal Utility District beginning December 1, 1979, will assure that the dose to a real individual from all uranium fuel cycle sources* up to a distance of five miles from the Rancho Seco Unit No. 1 site will be limited to less than or equal to 25 millirem per year to the whole body or any organ (except the thyroid, which will be limited to less than or equal to 75 millirem per year).

To insure compliance with the above 40 CFR 190 limits, the District will prepare and submit to the NRC a Special Report within 60 days if any of the following conditions occur:

1. The dose to an individual from radioactive materials in liquid effluents released from the site during any calendar quarter exceeds 3 millirem to the whole body and 10 millirem to any organ,
2. The dose to an individual from radioactive materials in liquid effluents released from the site during any calendar year exceeds 6 millirem to the whole body and 20 millirem to any organ,

* As defined in 40 CFR 190.02(b). Doses arising from operations associated with milling of uranium ore, however, need not be considered until December 1, 1980.

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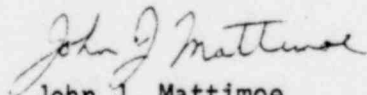
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3. The air dose beyond the site boundary due to noble gases released in gaseous effluents during any calendar quarter exceeds 10 millirad for gamma radiation and 20 millirad for beta radiation,
4. The air dose beyond the site boundary due to noble gases released in gaseous effluents during any calendar year exceeds 20 millirad for gamma radiation and 40 millirad for beta radiation,
5. The dose to an individual from radioiodines and particulates with half-lives greater than 8 days in gaseous effluents released beyond the site boundary during any calendar quarter exceeds 15 millirem to any organ,
6. The dose to an individual from radioiodines and particulates with half-lives greater than 8 days in gaseous effluents released beyond the site boundary during any calendar year exceeds 30 millirem to any organ.

This Special Report shall include an analysis which demonstrates that radiation exposures to any real individual from the uranium fuel cycle sources are less than the 40 CFR 190 Standard. In addition, the District will limit subsequent releases such that the 40 CFR 190 Standard is not exceeded unless a variance is obtained from the NRC permitting releases which exceed that Standard.

If you have any questions concerning this commitment to compliance, please contact Mr. R. Colombo of my Rancho Seco staff.

Sincerely,



John J. Mattimoe
Assistant General Manager
and Chief Engineer