

Docket File

OCT 28 1977

Docket No. 50-320

MEMORANDUM FOR: W. Ragan, Chief, Environmental Projects Branch No. 2, DSE

FROM: J. Collins, Chief, Effluent Treatment Systems Branch, DSE

SUBJECT: REVIEW OF APPLICANT'S ENVIRONMENTAL TECHNICAL SPECIFICATIONS AND BIOLOGICAL SAMPLING AND ANALYSIS PROCEDURES DOCUMENT FOR THREE MILE ISLAND, UNIT NO. 2

We have reviewed the applicant's proposed Environmental Technical Specifications for Three Mile Island, Unit No. 2, dated September 16, 1977, and the Biological Environmental Technical Specification Procedures Document for Three Mile Island, Unit No. 2, dated October 3, 1977. Our comments on the applicant's Environmental Technical Specifications are shown as corrections or additions on a copy of the specification which is enclosed. We have no comments on the Procedures Document, since it is concerned with offsite sampling and analysis procedures and which falls outside our review area.

ORIGINAL SIGNED BY
JOHN T. COLLINS

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Enclosures:
ETSB Comments

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radioactive gases and 2 percent of the release rate of I-131 and particulates with half-lives greater than 6 days, averaged over any calendar quarter. The intent of this specification is to permit the licensee the flexibility of operation to assure that the public is provided a dependable source of power under unusual operating conditions.

to be revised to reflect the higher release than the objective

Specification e. above, requires a 45 day holdup time for radioactive gaseous wastes collected in the gas decay tanks to assure decay of most radionuclides. The isces (mainly from Sr-90) at the site boundary after 45 days of holdup is expected to result in less than 10 mrem/yr.

Specification f. above, limits the radioactivity that may be released to the environment to "as low as practicable."

Specification g. above, limits the maximum offsite dose to well below the limits of 10 CFR 100, postulating that the rupture of a Waste Gas Decay Tank holding the maximum activity releases all of the contents to the atmosphere.

In addition to the limiting conditions for operation listed under a, b, and c above, the reporting requirements of Specification h. delineate that the licensee shall identify the cause whenever the radioactive gaseous release rate exceeds 4 percent of Specification a. or 2 percent of Specification b. above, averaged over a calendar quarter, and describe the proposed program of action to reduce such release rate. The report must be filed within 30 days following the calendar quarter in which more than twice the design release rate occurred.

REFERENCES

- (1) Meteorology and Atomic Energy, pp. 204
- (2) Meteorology and Atomic Energy, pp. 112

Rules (Cont'd)

including fuel filters, primary system leak test, primary to secondary system leakage, and the performance of particulate removal mechanisms.

Specification B. above, requires the licensee to limit the concentration of noble gases from the reactor to levels specified in 10 CFR 20, Appendix B, for unrestricted areas. Based on a N/Q of 8 R 10^{-6} sec/l³, this specification provides assurance that no matter at the General Public would be exposed to radioactive materials in excess of limits specified in the Commission's rules and regulations.

Specification C. above, requires the licensee to limit the concentration of I-131 and particulates with half-lives greater than eight days, released from the reactor to $1/200$ of the limits of 10 CFR 20, Appendix B for unrestricted areas. This reduction factor of 200, and a grazing period of 5 months have been arbitrarily applied to radionuclides of iodine and to all radionuclides in particulate form with a half-life greater than eight days, to allow for the milk exposure pathway. The release rate is determined by:

$$R \frac{Q_1 (s) (700)}{(APC) (3)} < \frac{Q (m^3)}{\bar{X} (sec)}$$

I-131

where Q_1 and APC are defined in B. above. The X/Q of 8.3×10^{-7} sec/m³ is derived from the annual average meteorological data where the nearest cow grazes 1-1/2 miles away. The g value accounts for the function of time that the cow spends in the pasture, i.e., 5 months per year.

Specification C. above, establishes an upper limit for the release of cesium activity at 16 percent of instantaneous release limit of

TABLE 2.3-3 (Cont'd)

sampled during periods when no waste gas decay tank release or reactor building purge is in progress.

Deviations from the sampling and analysis regime will be noted in the report specified in 2.6.1.

The Auxiliary and Fuel Handling Building Exhaust Vent and Reactor Building Purge Vent pertain to Unit 1 (UWI-1), while the unit exhaust vent pertains to Unit 2 (UWI-2).

DETECTABILITY LIMITS UNDER VARIOUS RELEASE AND ANALYSIS (3)

Sample Type	Sampling Frequency	Type of Analytic Technique	Detectable Concentration
<u>Light Gas Heavy Tank Releases</u>			
as	Each Tank	H-3	10^{-6} $\mu\text{Ci/cc}$
	Release	Individual Gamma Emitters	10^{-4} $\mu\text{Ci/cc}$ (2)
<u>Reactor Building Purge Releases</u>			
as	Each Surge	H-3	10^{-6} $\mu\text{Ci/cc}$
		Individual Gamma Emitters	10^{-4} $\mu\text{Ci/cc}$ (2)
<u>Reactor Vacuum Pump Releases</u>			
as	Monthly	H-3	10^{-6} $\mu\text{Ci/cc}$
	Monthly(3)	Individual Gamma Emitters	10^{-4} $\mu\text{Ci/cc}$ (2)
<u>Effluent and Fuel Handling Buildings Exhaust Vent, Reactor Building Purge Vent and Unit Exhausts</u>			
<u>and Release Points</u>			
as	Monthly	H-3	10^{-6} $\mu\text{Ci/cc}$
		Individual Gamma Emitters	10^{-4} $\mu\text{Ci/cc}$ (2)
arecol	Weekly(4)	I-131, I-133, I-135	10^{-12} $\mu\text{Ci/cc}$
articulates	Weekly	Individual Gamma Emitters	10^{-10} $\mu\text{Ci/cc}$ (2)
	Monthly Composite	Sr-89, Sr-90	10^{-11} $\mu\text{Ci/cc}$
	Monthly Composite	Gross α	10^{-11} $\mu\text{Ci/cc}$

The above detectability limits are based on technical feasibility and on the potential significance in the environment of the quantities released. For some nuclides, lower detection limits may be readily achievable and when nuclides are measured below the stated limits, they should also be reported.

For certain mixtures of gamma emitters, it may not be possible to measure radionuclides at levels near their sensitivity limits when other nuclides are present in the sample at much higher levels. Under these circumstances, it will be more appropriate to calculate the levels of such radionuclides using observed ratios in the gaseous component in the reactor coolant for those radionuclides which are measurable.

Analysis shall also be performed following each refueling period, start-up or similar operational occurrence which could alter the mixture of radionuclides. 42-152

Specification (Cont'd)

h. At least annually, automatic indication and closure of the Waste Gas Decay Tank Bypass valve on alarm of (Unit 1: H-107 and H-108; Unit 2: H-109 and H-110) shall be verified.

i. The Auxiliary and Fuel Handling Building and B. E. Waste Handling Building (Unit 1: H-101 and H-102; Unit 2: H-103, H-104, and H-105), respectively, shall be calibrated at least quarterly by means of a known radioactive source. These detectors shall have an independent channel test at least monthly, and a sensor check at least daily, to verify that the read-out device is indicating as expected.

Notes

The specified levels provide reasonable assurance that the resulting annual exposure rate from noble gases at any location at the site boundary will not exceed 10 millirems per year. At the same time, these specifications permit the flexibility of operation, compatible with consideration of health and safety, to assure that the public is provided a dependable source of power under unusual operating conditions, which may temporarily result in higher than the design objective annual releases, but still within the concentration limits specified 10CFR 20. It is expected that using this operational flexibility under unusual operating conditions, and by exerting every effort to keep levels of radioactive material in gaseous wastes as low as practicable, the annual releases will not exceed a small fraction of the annual concentration limits specified in 10CFR 20. These efforts should include consideration of meteorological conditions during releases.

The annual objectives have been developed taking into account a combination of system variables

Notes

Specifications 1. through i. above, require that available equipment to monitor the radioactive gaseous releases are operating during any period these releases are taking place.

The surveillance requirements given under the remaining Specifications above, provide assurance that radioactive gaseous effluents from the station are properly controlled and monitored over the life of the station. These surveillance requirements provide the data for the licensee and the Commission to evaluate the station's performance relative to radioactive gaseous wastes released to the environment.

Reports on the quantities of radioactive materials released in gaseous effluents shall be furnished to the Commission on the basis of Section 5.6.1 of these Technical Specifications. On the basis of such reports and any additional information the Commission may obtain from the licensee or others, the Commission may from time to time require the licensee to take such action as the Commission deems appropriate.

Radioactive Effluents

3. 0.024 $\mu\text{Ci}/\text{sec}$ (Iodine 131 and particulates with half-lives greater than 8 days)

4. Radioactive gas and particulates sampled from the reactor building shall be filtered through the high efficiency particulate air filter and through a scrubber.

5. The maximum activity to be released in the gas decay tank shall not exceed 2000 curies (equivalent to 1000 Ci).

6. When the annual release rate of radioactive materials in gaseous wastes, averaged over a calendar quarter exceeds,

$$\frac{Q_i}{(VWC)_i} < 4.8 \times 10^3 \frac{\mu\text{Ci}}{\text{cc}}$$

(noble gases)

or

0.024 $\mu\text{Ci}/\text{sec}$ (Iodine 131 and particulates with half-lives greater than 8 days)

The licensee shall notify the NRC within 30 days, identifying the causes and describing the proposed Program of action to reduce such release rates.

2. The Purge Exhaust Valves (Unit 1: EM-11A and EM-11B and Dumpers; Unit 2: EM-12A/B and EM-12C/D) shall be operable.

3. The valves (Unit 1: EM-11A and EM-11B and Dumpers; Unit 2: EM-12A/B and EM-12C/D) shall be interlocked to close or recirculate, respectively on receipt of a high radiation signal from the Reactor Building Exhaust Monitor (Unit 1: EM-10; Unit 2: EM-9A and EM-9-B) respectively.

4. The flow rate for radioactive effluents systems and the Auxiliary and Fuel Building Building and the Reactor Building, shall be monitored and recorded. Gaseous effluents from the Waste Gas Decay Tanks and the Reactor Building Purge Exhaust shall be continuously monitored and recorded.

5. Radioactive gaseous waste sample and activity analysis shall be performed in accordance with Table 2.3.

6. The waste gas decay tank effluent monitor (Unit 1: EM-A7; Unit 2: EM-B-1480) shall be tested using the installed check source or equivalent prior to any release of radioactive gas from a holding tank and shall be calibrated quarterly using a referenced calibration source in a controlled reproducible geometry.

7. During power operation, the condenser vacuum pump discharge shall be continuously monitored for gross gaseous activity. The monitor shall not be inoperable for more than a week. Whenever this monitor is inoperable, a grab sample shall be taken daily and analyzed for gross radioactivity. (B, γ).

8. Facility records shall be maintained of radioactive concentration, release rate and volume of each batch of gaseous effluents released and the length of time over which release occurred. Estimates of the probabilistic error associated with such reported values shall be included in facility records.

Specifications

- a. The instantaneous release rate of gross gaseous activity except for halogens and particulates with half-lives longer than eight days

$$\sum \frac{Q_i}{(MPC)_i} \leq 1.2 \times 10^5 \frac{m^3}{sec}$$

where Q_i is the release rate in $\mu Ci/sec$ for isotope i , and $(MPC)_i$ ($\mu Ci/m^3$) is the maximum permissible concentration of isotope i and defined in Appendix B, Table II, Column 1, 10CFR 20.

- b. The instantaneous release rate of I-131 and particulates with half-lives greater than eight days, released to the environs as part of airborne effluents, shall not exceed 0.53 $\mu Ci/sec$.

- c. The release rate of gross gaseous activity shall not exceed:

$$\sum \frac{Q_i}{(MPC)_i} \leq 1.9 \times 10^4 \frac{m^3}{sec}$$

when averaged over any calendar quarter.

- d. The release rate of I-131 and particulates with half-lives greater than 8 days, shall not exceed: 0.05 $\mu Ci/sec$, when averaged over any calendar quarter.

- e. Radioactive gaseous wastes collected in the gas decay tanks shall be held up to a minimum of 45 days, except when the release rate shall not exceed:

$$1. \sum \frac{Q_i}{MPC_i} \leq 2.4 \times 10^3 \frac{m^3}{sec}$$

(noble gases)

and or

Specifications

During release of radioactive process wastes, the following conditions shall be met:

- A. During release of gaseous waste from the waste gas decay tanks, the following conditions shall be met:

1. Waste gas discharge monitor (Unit 1: RM-A7; Unit 2: WDC-R-1480) or similar device, shall be operable.

2. Auxiliary and Fuel Handling Building and Unit Exhaust Vent exhaust gas, iodine and particulate monitor (Unit 1: RM-A8; Unit 2: WDC-R-119) or similar device, shall be operable.

3. The waste gas decay tank discharge valves (Unit 1: WDC-V-7; Unit 2: WDC-V-30A or 30B) shall be operable.

4. The waste gas decay tank discharge valves (Unit 1: WDC-V-7; Unit 2: WDC-V-30A or 30B) shall be closed on receipt of any one of the following conditions:

- a. a high radiation signal from the waste gas discharge monitor (Unit 1: RM-A7; Unit 2: WDC-R-1480).

- b. a high radiation signal from the Auxiliary and Fuel Building exhaust monitor (Unit 1: RM-A8; Unit 2: WDC-R-119).

- c. a high flow signal from the Waste Gas Decay Tank discharge flow transmitter (Unit 1: FT-123; Unit 2: WDC-FT-3923).

- B. During purge of the Reactor Building, the following conditions shall be met:

1. The Reactor Building Purge Exhaust Monitor (Unit 1: RM-A9; Unit 2: HP-225 and/or HP-R-226 and HP-R-219) or similar device shall be operable.

- d. a low flow trip signal from the Auxiliary and Fuel Handling Building exhaust monitor (Unit 1: RM-A8; Unit 2: WDC-R-119)

4. 105

Basin (Cont'd)

the calendar quarter in which the 2.5 curies release occurred.

2.3.2 Gaseous EffluentsApplicability

Applies to the controlled release of radioactive gases from Unit Nos. 1 and 2.

Objective

To define the limits and conditions for the controlled release of radioactive gaseous effluents to the environs to ensure that these releases are as low as practicable. These releases should not result in radiation exposures in offsite areas greater than a few percent of background exposures. The instantaneous release rate for all effluent discharges should be within the limits specified in 10CFR 20.

To assure that the releases of radioactive gases to offsite areas meet the as low as practicable concept, the following objectives apply:

a. The release rate of radionuclides, averaged over a yearly interval, except I-131 and particulate nuclides with half-lives greater than 8 days, discharged from Unit Nos. 1 and 2, should result in a dose rate at the site boundary of less than 10 μ rem/yr to the whole body or any organ.

b. The release rate of I-131 and other particulate radionuclides with half-lives longer than 8 days, should result in a dose in the unrestricted area of less than 15 μ rem/yr by inhalation or to the thyroid of a child through the cow-milk chain.

Objective

To ensure that radioactive gas releases from the facility are within the limits of specification.

Liquid Effluents

Application

Applies to the controlled release of radioactive liquids from Unit Nos. 1 and 2.

Objective

To define the limits and conditions for the controlled release of liquid radioactive effluents to the environment to ensure that these releases are as low as practicable. These releases should not result in waterborne exposure to off site areas greater than a few percent of background exposures. The instantaneous release rate for all effluent discharges should be within the limits specified in 10CFR Part 20.

To ensure that the releases of radioactive liquids to off site areas meet the "as low as practicable" concept, the following objectives apply:

- a. The annual total quantity of radioactive materials in liquid waste, excluding tritium and dissolved gases, should not exceed 5 curies per radioactive water-producing reactor, and the annual dose to the whole body or any organ of an individual should not exceed 5 mrem from the combined releases of Unit Nos. 1 and 2.
- b. The annual average concentration of radioactive materials in the effluent from the Mechanical Draft Cooling Towers prior to dilution in the Susquehanna River, excluding tritium and dissolved gases, should not exceed 2×10^{-6} uci/ml.
- c. The annual average concentration of tritium in liquid waste prior to dilution in the environment should not exceed 5×10^{-6} uci/ml.

Objective

To ensure that radioactive liquid releases from the facility are within the limits of Specifications 2.3.1 a. through e.

Specifications

a. The radioactivity release concentration in liquid effluents from Unit Nos. 1 and 2 to the environment shall not exceed the values specified in 10 CFR 20, Appendix B, for unrestricted areas.

b. The total release of radioactive liquid effluent from Unit Nos. 1 and 2, excluding tritium and dissolved gases, shall not exceed 10 curies per radioactive waste-producing reactor during any calendar quarter.

c. The equipment installed in the liquid radioactive waste system shall be maintained and shall be operated to process all radioactive liquid wastes prior to their discharge when the activity release rate will exceed 1.25 curies per radioactive waste producing reactor, excluding tritium and dissolved gases, during any calendar quarter.

d. The maximum radioactivity to be contained in one liquid radioactive tank, excluding tritium and dissolved gases, that can be discharged directly to the environs, shall not exceed 10 curies.

e. When the average release rate of radioactive effluents, excluding tritium and dissolved gases, exceeds 2.5 curies per radioactive waste-producing reactor during any calendar quarter, the licensee shall notify the NRC within 30 days, identifying the causes and describing the proposed program of action to reduce such release rates.

Specifications

During release of liquid radioactive wastes from the Waste Evaporator Condensate Storage Tank and the Waste Evaporator Condensate Test Tank, the conditions shall be met.

a. The liquid gross activity monitors (Unit 1: WM-15; Unit 2: WM-2-1511) or similar device, and recorder on the radioactive effluent line shall be operable.

b. The liquid gross activity monitors (Unit 1: WM-15; Unit 2: WM-2-1511) or similar device shall be set to alarm and automatically close waste discharge valve (Unit 1: WM-V-257; Unit 2: WM-V-99) respectively prior to exceeding the limits specified in 10 CFR 20, Appendix B for unrestricted areas.

c. Liquid waste radioactivity and flow rate from the waste evaporator condensate storage tank (Unit 1) and the waste evaporator condensate test tank (Unit 2) shall be continuously monitored and recorded during release. If this requirement cannot be met, continued release of liquid effluents shall be permitted only during the succeeding 48-hour period provided that during this 48-hour period two independent samples of each tank shall be analyzed and two stations personnel shall independently check valve line-up prior to the discharge.

d. Facility records shall be maintained of the radioactive concentrations and volume before dilution of each batch of liquid effluent released, and the average dilution flow and length of time over which each discharge occurred.

e. Liquid waste sampling and analysis shall be in accordance with 10 CFR 20.1.5

Points to the release of each batch of liquid effluent, a sample shall be taken from that batch and analyzed for the concentration of each significant gamma emitting radionuclide compliance with 10 CFR 20.1.5

Specification (Cont'd)

f. The liquid effluent radiation monitors RM-16 and WDL-R-1311 shall be calibrated at least quarterly by means of a known radioactive source. RM-16 and WDL-R-1311 shall also have an instrument channel test weekly and a source check prior to each discharge to verify that the read-out device is indicating as expected.

g. The ability of WDL-V-257 and WDL-V-22 to close automatically on receipt of a high radiation alarm signal from RM-16 and WDL-R-1311 shall be checked annually.

Radioactive Liquid Waste Sampling and Analysis (4, 5)

A. Monitor Tank Releases

<u>Sampling Frequency</u>	<u>Type of Activity Analysis</u>	<u>Detectable Concentration (3)</u>
Each Batch	Individual Gamma	5×10^{-7} uci/ml (2)
	H-3	10^{-5} uci/ml
	Gross Alpha	10^{-7} uci/ml
Monthly Composite (1)	Sr-89	5×10^{-8} uci/ml
	Sr-90	5×10^{-8} uci/ml

Notes

- (1) A composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged from the plant.
- (2) For certain mixtures of gamma emitters, it may not be possible to measure radionuclides in concentration near this sensitivity limits when other nuclides are present in the sample in much greater concentrations. Under these circumstances, it will be more appropriate to calculate the concentrations of such radionuclides using measured ratios with those radionuclides which are routinely identified and measured.
- (3) The detectability limits for radioactivity analysis are based on the technical feasibility and on the potential significance in the environment of the quantities released. For some nuclides, lower detection limits may be readily achievable and when nuclides are measured below the stated limits, they should also be reported.
- (4) The results of these analyses should be used as the basis for recording and reporting the quantities of radioactive material released in liquid effluents during the sampling period. In estimating releases for a period when analyses were not performed, the average of the two adjacent data points spanning this period should be used. Such estimates should be included in the effluent records and reports; however, they should be clearly identified as estimates, and the method used to obtain these data should be described.
- (5) Deviations from the sampling/analysis regime will be noted in the report specified in 5.6.1.

Issues

Highly radioactive waste release levels to unrestricted areas should be kept "as low as practicable" and the not to exceed the concentration limits specified in 10CFR 20. The objective provides reasonable assurance that the resulting annual exposure to an individual in unrestricted areas will not exceed 5 millirem per year. In this case also, these specifications permit the flexibility of operation, compatible with considerations of health and safety, to assure that the public is provided a dependable source of power under unusual operating conditions, which may temporarily result in higher than normal releases, but still within the concentration limits specified in 10CFR 20. It is expected that by using this operational flexibility under unusual operating conditions, and exerting every effort to keep levels of radioactive material in liquid wastes as low as practicable, the annual releases will not exceed a small fraction of the annual average concentration limits specified in 10CFR 20.

Specification a. above requires the licensee to limit the concentration of radioactive materials in liquid effluents from the station to levels specified in 10CFR 20, Appendix B, for unrestricted areas. This specification provides assurance that no member of the general public can be exposed to liquids containing radioactive materials in excess of limits considered permissible under the commission's rules and regulations.

Specification b. above establishes an upper limit for the release of radioactive liquid effluents, excluding tritium and dissolved gases, of 10 curies per unit during any calendar quarter. The intent of this specification is to permit the licensee the flexibility of operation to assure that the

Issues

Specifications a, b, and c, above require that suitable equipment to monitor the release of radioactive materials in liquid effluents are operating during any period these releases are taking place.

The surveillance requirements given in the remaining specifications provide assurance that liquid wastes are properly controlled and monitored during any planned release of radioactive materials in liquid effluents. These surveillance requirements provide the data for the licensee and the commission to evaluate the station's performance relative to radioactive liquid wastes released to the environment.

Reports on the quantities of radioactive materials released in liquid effluents shall be furnished to the Commission on the basis of Section 5.6.1 of these Technical Specifications. On the basis of such reports and other relevant information obtained from the licensee or others, the Commission may require the licensee to take appropriate actions.

which is provided a dependable source of cover water, unusual operating conditions, which may temporarily result in releases higher than the levels normally achievable when the station and the liquid radwaste equipment are functioning as designed. Releases of up to 10 curies per radioactive waste-producing reactor during any calendar quarter will result in concentrations of radioactive materials in liquid effluents at small percentages of the limits specified in 10 CFR 20.

Specification a. requires that the licensee shall maintain and operate the equipment installed in the liquid radioactive waste system to reduce the release of radioactive materials in liquid effluents to as low as practicable, consistent with the requirements of 10 CFR 50.

3fa. Normal use and maintenance of installed equipment in the liquid radioactive system is expected to result in releases of not more than about five curies per radioactive waste-producing reactor per year, excluding tritium and dissolved gases during normal operations. In order to keep releases of radioactive materials as low as practicable, the specification requires, as a minimum, operation of equipment whenever the rate of release exceeds 1.25 curies per radioactive waste-producing reactor per quarter, excluding tritium and dissolved gases.

In addition to the limiting conditions for operation listed under Specification b., the reporting requirements of Specification e., the requirements of Section 5.6.2, delineate that the licensee shall identify the cause whenever the rate of radioactive effluents, excluding tritium and noble gases, exceeds 2.5 curies per radioactive waste-producing reactor during any calendar quarter and describe the proposed program of action to reduce such release rate. This report must be filed within 30 days following