



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

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JULY 3 1979

Docket No. 50-271

Mr. Robert H. Groce
Licensing Engineer
Yankee Atomic Electric Company
20 Turnpike Road
Westboro, Massachusetts 01581

Dear Mr. Groce:

By letter dated August 16, 1978 and February 23, 1979, you requested an amendment to the Appendix B Non-Radiological Environmental Technical Specifications (ETS) for the Vermont Yankee Nuclear Power Station. We addressed the portion of the August 16, 1978 request pertaining to open cycle operation in Amendment No. 48 to the Vermont Yankee license dated October 13, 1978. In addition to open cycle operation, you also proposed changes to limiting conditions for operation, reporting requirements and monitoring programs which would eliminate duplication of regulation by EPA and NRC.

As your proposed changes are extensive, we are preparing to rewrite the entire appendix B ETS in a new format. This format is used for the ETS on newly licensed plants and will be used to "standardize" ETS for all plants. The changes that will result from adopting the new ETS are as follows:

1. Water quality limits in the current ETS, which are exactly duplicative of those in the NPDES permit level will become ETS monitoring requirements. These monitoring requirements will refer to and rely on the NPDES permit for the details of the program, the reporting of violations, and the reporting of changes to the permit.
2. Water quality LCOs which differ from the NPDES permit restrictions will be retained in the new ETS when the amendment of the ETS cannot be supported by an EIA. Discussions with the NPDES permitting authority and the utility will be conducted to resolve and eliminate differences to the maximum possible extent.
3. When requested by the licensee, far-field monitoring programs in the current ETS will be reviewed for termination or modification. If any monitoring programs are to be continued and an acceptable monitoring program is required by the NPDES permit then the new ETS will rely on the NPDES permit requirement.

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Monitoring programs which are retained and do not rely on the NPDES permit will have the details of the monitoring program placed in a separate "procedures" document to be administered by the licensee. Formal ETS changes will not be required for changes to the procedures manual.

4. A new definition section is added to define more precisely important words or concepts, including those of importance in the NPDES permit.
5. A new administrative section is added which establishes procedures for: the reporting of monitoring results; reporting of violations to state and federal permits; changes to station design or operating procedures; changes to the ETS or to the NPDES permit which would affect the ETS; and the retention of records.

Because you did not request all of the above changes, we have enclosed the rewritten ETS (Enclosure 1) for your review. Should you have questions on the new ETS please call the Vermont Yankee Project Manager, Vernon Rooney on (301) 492-7872 to arrange such discussions as are necessary.



Thomas A. Ippolito, Chief
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Enclosure:
Environmental Technical
Specifications

Mr. Robert H. Groce
Yankee Atomic Electric Company

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