



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

July 13, 1979

NRC PDR

Docket No. 50-54

Mr. C. J. Konnerth, Manager
Health, Safety & Environmental Affairs
Union Carbide Corporation
Medical Products Division
P. O. Box 324
Tuxedo, New York 10987

Dear Mr. Konnerth:

We have reviewed your letter of June 5, 1979, requesting clarification of the environmental considerations contained in Section C of the Safety Evaluation (SE) which was enclosed with Amendment No. 14 to Facility Operating License No. R-81 of your pool-type reactor at Tuxedo, New York.

Section C of the SE states that the environmental portions of the Amendment Technical Specifications (TS) include effluent releases from the total facility which includes the reactor, under NRC license, and the hot cells, under New York State license. Such a condition is necessary because of the use of a common stack release which makes it impractical to separate radioactive effluents from the two licensed activities. Since the major source of release originates from the hot cells, it is our intent to have New York State Department of Environmental Conservation (NYSDEC) take the lead in establishing the final radioactivity effluent limits. If necessary, when the NYSDEC limits are established, we intend to modify the environmental portions of the TS such that the requirements of both agencies will be consistent.

We understand that the NYSDEC consent order you received in early 1978 includes a schedule for obtaining pertinent information so that NYSDEC can evaluate and establish requirements to meet the long term objectives of maintaining effluents as low as reasonably achievable (ALARA). The information to be obtained includes not only additional on-site meteorological data but also calculated population exposures, availability and cost of effluent control systems and the development of an expanded environmental monitoring program. Final TS to meet the long term ALARA objectives can only be issued after NYSDEC has completed the evaluation of this information.

The compliance schedule of the consent order provides a period up to January 31, 1980, for you to provide the information. The development of the NYSDEC's requirements depends, in part, on the completeness of the information submittal. At present, there is no schedule for the issuance of those requirements by NYSDEC and could well run into 1981. In the interim, the environmental portions of the

655 351

7908140 282

Amendment No. 14 to the TS provide controls on the radioactivity releases such that, based on the limited information presently available to us, there is reasonable assurance that the dose limits and ALARA objectives of 10 CFR 20 can be met.

Your letter states that, at the present time, you have four off-site air samplers running continuously. The Amendment No. 14 required two airborne environmental samplers at specified locations and may require relocating the present samplers. Your effort and expense to implement the amended TS should mostly be in the administrative area. In view of the fact that no schedule for the final NYSDEC limits is available and the fact that those final limits are not known now to affect the TS, we have determined that you should implement the environmental portions of the Amendment No. 14 TS as issued within the specified time period.

Sincerely,



Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

cc:
Mr. K. D. George
Mr. John W. Paradiso
Union Carbide Nuclear Center
P. O. Box 324
Tuxedo, NY 10987