

FROM: Metropolitan Edison Company Reading, Penn. 19603 L.L. Lawyer			DATE OF DOC 5-22-74	DATE REC'D 5-24-74	LTR X	MEMO	RPT	OTHER
TO: F.A. St. Mary			ORIG 1 signed	CC	OTHER	SENT AEC PDR XXX SENT LOCAL PDR XXX		
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 1		DOCKET NO: 50-289		

DESCRIPTION:
Ltr commenting on the reporting requirements
for sampling methods specified in the Environ
tech specs.....

ENCLOSURES:

ACKNOWLEDGED
DO NOT REMOVE

PLANT NAME: Three Mile Island

FOR ACTION/INFORMATION

5-28-74

JB

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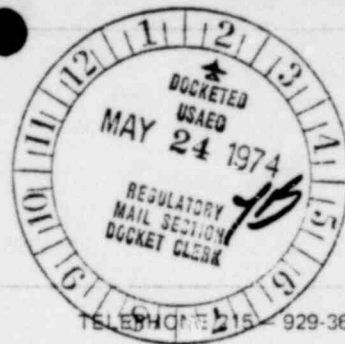
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METROPOLITAN EDISON COMPANY

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603



May 22, 1974

Mr. F. A. St. Mary
Environmental Projects Branch #4
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

50-289



Dear Mr. St. Mary:

The purpose of this letter is to:

- (1) present my interpretation of the reporting requirements associated with alternate sampling methods specified in the Environmental Technical Specifications for Three Mile Island Unit 1 (ETS-1);
- (2) present my comments on the general organization of Section 2.0; and
- (3) solicit your response to both of the foregoing.

Reporting Requirements Associated With Alternate Sampling Methods

The first issue I address is whether, in complying with the ETS-1 environmental monitoring requirements, the use of an alternate method of sampling or use of "similar device" equipment in lieu of the normal sampling method or equipment constitutes exceeding a Limiting Condition for Operation (LCO) and is, therefore, reportable in accordance with ETS-1 Sections 5.4 and 5.6.2.c. I think, clearly, that the use of the alternate sampling method does constitute operation within the LCO and is, therefore, not reportable under the Sections cited above.

As an example of this interpretation (reference: ETS-1, pages 27 and 30), assume the condenser vacuum pump discharge monitor were inoperable (for less than a week) but that grab samples were taken daily and analyzed for gross radioactivity (β, γ). This circumstance would not constitute exceeding an LCO by not "continuously" monitoring for gross radioactive gas, thereby necessitating submittal of a report within 24 hours to the Director of Regulatory Operations in accordance with ETS-1, Sections 5.4 and 5.6.2.c since initiation of the alternate monitoring technique complies with the specification.

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May 22, 1974

Comments Regarding General Organization of ETS-1 Section 2.0

My comment on the general organization of ETS-1, Section 2.0, is that I feel the use of "Limiting Conditions for Operation" has been inappropriately extended far beyond that required to comply with commission regulations. 10 CFR 50.36a is less than definitive on the usage of the term Limiting Conditions for Operation; however, it does specify that "...license...will include technical specifications that...require...that equipment installed in the radioactive waste system...be maintained and used." It is my contention that equipment specified in Section 2.0 under LCO--monitoring requirements--goes far beyond "equipment installed in the radioactive waste system." In attempting to interpret in this ill-defined area, I have considered the possibility of utilization of the LCO laid down in Section 50.36.c2. LCO is there defined to be "the lowest functional capability or performance levels of equipment required for safe operation of the facility." By analogy, then, I might, through an admitted over-extension of the regulations, define LCO in ETS-1 as the lowest functional capability or performance levels of equipment required to keep releases of radioactive materials to unrestricted areas during normal reactor operations as low as practicable. Had the commission included this definition of LCO in Section 50.36a, I would still maintain that ETS-1, Section 2.0, goes far beyond this definition.

I would contend that the left-hand column of Section 2.0 generally provides specifications to limit plant parameters. These limits seem to me to be the appropriate subject of LCO's; however, the right-hand column provides monitoring requirements, the specifications of which have the objective of "...ensuring compliance with the specifications of [the left-hand column]." It is my contention that "specifications to limit..." (left-hand column) are properly LCO's but that "specifications to ensure compliance with specifications..." are not.

Your patience and anticipated response are much appreciated.

Sincerely,



LAWRENCE L. LAWYER
Manager-Operational Quality Assurance

LLL:sh

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