

JAN 27 1977

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MEMORANDUM FOR: Harold R. Denton, Director, Division of Site Safety and Environmental Analysis

FROM: Richard S. Cleveland, State/Siting, Environmental Projects Branch 1

SUBJECT: THREE MILE ISLAND ETS (DRAFT CIRCULATED VIA 1/17/77 BALLARD MEMO)

Re your query as to these ETS being consistent with the decisions of the 1/17/77 Rusche meeting on ETS vs. NPDES requirements, the draft ETS is not consistent, as indicated below.

- 1) LCO 2.1.1 prescribes 3.0°C maximum ΔT across condenser vs. 2.8°C set in the NPDES permit. While the difference is small, there is a difference.
- 2) LCO's are established for non-radiological environmental issues.
- 3) Water quality requirements duplicate those covered in the NPDES permit.
- 4) There appears to be no reflection of the 401 certification and its requirements.

Original signed by  
Richard S. Cleveland  
Georgetown, Washington

Richard S. Cleveland, State/Siting EPM  
Environmental Projects Branch 1  
Division of Site Safety and  
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cc: G. Knighton  
W. Regan  
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R.Cleveland/lc G.Knighton

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