



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

NRC PD12

Docket No. 50-10

MAR 26 1980

The Honorable Timothy V. Johnson
Illinois House of Representatives
2058 Stratton Building
Springfield, Illinois 62706

Dear Mr. Johnson:

We have received your letter on the subject of the Dresden Unit No. 1 decontamination which enclosed a letter from Ms. Jean Mayes.

Our response to Ms. Mayes is enclosed for your information. This response provides the background of the Dresden decontamination review and identifies the actions for which the Commission must prepare an Environmental Impact Statement.

Please be assured that the Dresden decontamination will not take place until the Nuclear Regulatory Commission has ruled on the need for an Environmental Impact Statement.

We will inform you of our decision in this matter. If we may provide any additional information, please feel free to contact us.

Sincerely,

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
Letter to Ms. Mayes

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

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

NRC PDR

MAR 29 1980

Docket No. 50-10

Ms. Jean Mayes
2006 Southwood Drive
Champaign, Illinois 61820

Dear Ms. Mayes:

This is in response to your recent letter to Acting Chairman Ahearne, which expressed your concern related to the chemical decontamination of Dresden Nuclear Power Station, Unit No. 1.

We have been reviewing this project since Commonwealth Edison's initial decontamination proposal on December 12, 1974. On December 9, 1975, we issued a conditional authorization which allowed Commonwealth Edison to initiate the chemical decontamination subject to the completion of three items which would be resolved as follows:

1. The testing program will be completed and the results submitted for the review and approval of the NRC staff prior to performing the proposed chemical cleaning.
2. A pre-service inspection program for the primary coolant boundary will be formulated and submitted for NRC review and approval prior to returning the reactor to service.
3. A post-cleaning surveillance program which includes additional surveillance specimens and a specimen withdrawal and examination schedule will be submitted for NRC review and approval prior to returning the reactor to service.

A copy of our Safety Evaluation in support of these actions is enclosed for your information.

Since our 1975 authorization Commonwealth Edison has completed its materials test program and construction of the necessary support facilities to carry out the project in a safe and environmentally acceptable manner. Our review of the testing program and the facility construction is continuing and will be completed prior to the chemical cleaning that is currently scheduled for the first half of 1980.

The decontamination process involves the circulation of a Dow Chemical Company cleaning solvent through the reactor primary cooling system. The solvent, identified as NS-1, has been developed to remove the thin, tightly adherent, layer of highly radioactive oxide that has formed on the inside surfaces of the Dresden 1 primary cooling system.

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The solvent will preferentially dissolve the oxide without significantly attacking the underlying base metal of the primary cooling system piping.

After removal of the uranium fuel, the solvent will be circulated through the primary coolant system for approximately 100 hours at about 250°F. After circulation the solvent and the dissolved oxides will be drained from the reactor to a waste treatment facility located adjacent to the reactor. Any remaining solvent will be cleaned from the reactor by rinsing with demineralized water. The rinse water and solvent will be stored in the waste treatment facility storage tanks until processed to concentrate and solidify the solvent and dissolved radioactive corrosion products.

The decontamination will be carried out entirely within a closed system and all waste processing will be accomplished within a specially designed, earthquake proof, leak tight, building. All transportation of radioactive wastes will be done in accordance with all applicable NRC and Department of Transportation regulations. Because of these precautions, there will be no increased hazard to the health and safety of the citizens of Illinois or any degradation of the environment in Illinois.

After processing the concentrated waste solution will be solidified in 55 gallon drums using a process developed by the Dow Chemical Company for the solidification of low level radioactive wastes. This solidification process has been tested on the NS-1 solvent and produced a solid waste form that contained no free liquids. The waste solidification procedures include a quality control process test on each barrel of waste to provide additional assurance that the liquid waste has been properly solidified.

After solidification the waste drums will be transported by a commercial radioactive waste carrier to a licensed solid waste burial ground such as Beatty, Nevada or Hanford, Washington. These arid, desert sites have been specifically selected for the disposal of the Dresden waste to further assure that there is no interaction of the waste with ground water. Because the waste is in a solid form, the ground water level is approximately 300 feet below the surface, and the burial sites are located in remote, uninhabited locations, there is adequate assurance that the waste will remain isolated from potential pathways for exposure of the population.

The cost of the Dresden 1 decontamination has been estimated at 36 million dollars. Much of this cost represents one time development costs which would not be incurred in subsequent reactor decontamination at Dresden 1 or other nuclear facilities. At this time there are no plans to decontaminate the primary cooling system of other U. S. nuclear facilities,

however, preliminary estimates of the cost for decontamination currently operating U. S. reactors range from 1 million to 5 million dollars per reactor and would vary depending on the extent of modification required at a specific facility to perform the decontamination.

The decontamination of reactor primary cooling systems will reduce the radiation exposure levels in the areas of these systems, thereby permitting greater access to the system for inspection, modifications, and repairs. These activities provide greater assurance of the continued safe operation of the reactor and are therefore in the best interest of the health and safety of the public. Furthermore, the decontamination will reduce the occupational exposure of the individuals employed at Dresden.

With respect to requests for the preparation of an Environmental Impact Statement for the Dresden Unit 1 decontamination, the Nuclear Regulatory Commission is fully committed to satisfying all requirements of the National Environmental Policy Act (NEPA). Our regulations which implement the NEPA requirements are contained in Title 10, Part 51.5, of the United States Code of Federal Regulations. These regulations are in conformance with guidelines issued by the President's Council on Environmental Quality which were in effect prior to July 30, 1979. They identify the following types of actions for which NRC must prepare an environmental impact statement:

- "(1) Issuance of a permit to construct a nuclear power reactor, testing facility, or fuel reprocessing plant pursuant to Part 50 of this chapter;
- (2) Issuance of a full power or design capacity license to operate a nuclear power reactor, testing facility, or fuel reprocessing plant pursuant to Part 50 of this chapter;
- (3) Issuance of a permit to construct or a design capacity license to operate an isotopic enrichment plant pursuant to §50.22 of this chapter;
- (4) Issuance of a license to possess and use special nuclear material for processing and fuel fabrication, scrap recovery, or conversion of uranium hexafluoride pursuant to Part 70 of this chapter;
- (5) Issuance of a license to possess and use source material for uranium milling or production of uranium hexafluoride pursuant to Part 40 of this chapter;
- (6) Issuance of a license authorizing commercial radioactive waste disposal by land burial pursuant to Parts 30, 40, and/or 70 of this chapter;

- (7) Conversion of a provisional operating license for a nuclear power reactor, testing facility or fuel reprocessing plant to a full power or design capacity license pursuant to Part 50 of this chapter where no final environmental impact statement has been previously prepared;
- (8) Issuance of a license to manufacture pursuant to Appendix M of Part 50 of this Chapter;
- (9) Amendments of Parts 30 and 40 of this chapter concerning the exemption from licensing and regulatory requirements of any equipment, device, commodity or other product containing byproduct material or source material; and
- (10) Any other action which the Commission determines is a major Commission action significantly affecting the quality of the human environment."

The Commission is presently in the process of modifying our Environmental Protection regulations to take into account, voluntarily, the regulations promulgated by CEQ which became effective July 30, 1979. We have concluded that this action is not one of these actions requiring an environmental impact statement under current Commission regulations.

While our regulations do not require the preparation of an environmental impact statement, we are evaluating the environmental impact of the proposed action to determine whether an environmental impact statement should be prepared because of specific circumstances related to this particular action. If it is determined that an environmental impact statement need not be prepared, a negative declaration and environmental impact appraisal will be prepared in accordance with Sections 51.7 and 51.50(d) of our procedures for environmental protection. We will complete our review and issue the appropriate statement or appraisal prior to the Dresden decontamination.

With regard to your comments about the study done at Oak Ridge National Laboratory report in Science, June 30, 1979, Commonwealth Edison, the licensee for Dresden Unit 1, has agreed to dispose of the Dresden 1 waste at either Beatty, Nevada or Hanford, Washington commercial low level waste burial sites. These sites differ significantly in their geologic and hydrologic characteristics from the Oak Ridge site where chelant-aided migration of radionuclides was observed.

Specifically, the Oak Ridge site, where migration occurred, experiences very high precipitation and has a water table so shallow that it probably intersects the disposal pits and trenches during periods of heavy rain fall. In addition, the Oak Ridge topography is hilly with steep slopes underlain by fractured shale material which allows underground water and radioactive waste to flow down hill through the fractures until it seeps to the surface within 250 feet of a perennial stream.

Conversely, the commercial waste burial sites at Beatty and Hanford, where no migration of radionuclides has been observed, are flat desert areas with very low precipitation, a water table approximately 300 feet below ground level and a distance of 8 to 10 miles to the nearest perennial stream.

In addition to these site characteristics, which prevent the migration of radioactive material from the desert waste burial sites, another significant difference between the proposed waste disposal technique and the now discontinued Oak Ridge methods is that the Dresden waste will be disposed of as a solid. At Oak Ridge over 35 million gallons of liquid radioactive waste was pumped into the disposal trenches. We estimate that approximately 7 million gallons of liquid waste was disposed of in Trench No. 7, which was identified as a source of chelated radionuclides. Because of the differences we have concluded that the Dresden wastes should be disposed of in dry burial site.

With respect to your request for information relative to a public hearing on this matter, the Illinois Safe Energy Alliance (ISEA) by petition dated September 20, 1979, requested that the Nuclear Regulatory Commission hold a public hearing on this issue. This petition is under review in accordance with the provisions of 10 CFR 2.206 of the Commission's regulations. I enclose for your information a copy of our letter accepting that petition. We will provide you with a copy of our response to the ISEA petition when it is available.

In summary, the Dresden decontamination has been carefully planned to improve the safety of the reactor and reduce the exposure of plant personnel to radiation. The waste produced by the process is similar in type and quantity to the waste routinely produced at Dresden and its processing, transportation, and disposal will not cause any new hazards not previously evaluated and deemed acceptable.

Sincerely,
Harold R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:

1. Safety Evaluation
2. Ltr. dtd. 10/30/79
to ISEA

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AUTHORIZATION TO CHEMICALLY DECONTAMINATE THE PRIMARY
COOLING SYSTEM AT DRESDEN UNIT 1

COMMONWEALTH EDISON COMPANY

DRESDEN NUCLEAR POWER STATION UNIT 1

DOCKET NO. 50-10

INTRODUCTION

By letters dated December 16, 1974, April 1, 1975 and April 14, 1975, the Commonwealth Edison Company (CECo) requested authorization to carry out a chemical decontamination of the interior surfaces of the Dresden Unit 1 primary coolant system.

The purpose of the decontamination is to remove a deposition of activated corrosion products which is tightly bonded to the primary coolant system piping and components. The presence of the corrosion products in the system results in high levels of radiation in adjacent areas and limits access to these areas for the purpose of in-service inspection, routine maintenance and plant modifications.

CECo has tentatively scheduled the chemical cleaning project to begin in January 1977 with an anticipated return to service scheduled for July 1977.

EVALUATION

The staff's review of CECo's proposed chemical decontamination of the interior surfaces of the Dresden Unit 1 primary coolant system has been completed. The results of this review are as follows:

1. Environmental Impact

The chemical decontamination of the Dresden 1 primary coolant system will be performed entirely within a closed decontamination system. The system has been designed so that no chemical or radiological wastes will be released to the environment from the decontamination process. All wastes generated in the process will be either solidified for offsite burial at a licensed burial ground or reprocessed for reuse onsite. The solid wastes produced are similar in type and quantity to those handled routinely at the site. Therefore, no adverse environmental impacts are anticipated due to the decontamination.

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2. Materials Compatibility

The staff has reviewed the results of the material testing program that has been carried out in support of the proposed Dresden 1 decontamination program. The test program was organized to look at corrosive effects during the decontamination process and possible residual effects during subsequent reactor operation.

Based upon our review of the results of the testing program completed to date, we have concluded that the test program adequately evaluated those aspects of the materials compatibility that we consider to be important. As a result of our discussions with CECO's consultant, Dr. Craig Cheng of Argonne National Laboratory, we find that the remaining program will be conducted in a manner that will answer our presently unresolved concerns and the test results will be adequately interpreted and reported.

We conclude that upon the successful completion of the testing program described in the submittals and with an adequate surveillance and inspection program, the Dresden Nuclear Power Station Unit 1 can be subjected to the described chemical cleaning process without undue corrosion or other deleterious materials compatibility effects that would adversely effect the integrity of the primary coolant system and connected systems.

A small number of items of concern have not been resolved to the staff's full satisfaction at this time. However, we conclude that authorization to carry out the chemical decontamination should be granted in anticipation of the successful resolution of these open items in the near future. The following open items are identified at this time as requiring resolution to the staff's satisfaction:

- (a) The materials test program will be completed and the test results will be analyzed and reviewed prior to the beginning of the cleaning process.
- (b) Surveillance specimens in addition to those now planned will be determined by mutual agreement with the applicant and a schedule for specimen withdrawal will be stated.
- (c) A pre-service inspection program for the primary coolant boundary and safety related systems will be formulated and performed prior to return to power.

3. Effluent Treatment Systems

We have determined that the effluent treatment system, if constructed as described in the CECO submittals, is capable of handling the types and quantities of effluents expected to be generated by the decontamination program. Our review was limited to the use of the system for chemical decontamination only, and use of the system for any other purpose subsequent to that program must be reviewed prior to such use.

4. Radiological Safety

We have further concluded that the radiological safety program described in the submittals is adequate to assure that the health and safety of the public and the onsite personnel will not be endangered by the Dresden 1 decontamination project.

CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) because the chemical cleaning does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the cleaning project does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: December 9, 1975



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

OCT 30 1979

Docket No. 50-10

Ms. Marilyn Shineflug
Illinois Safe Energy Alliance
P. O. Box 469
Antioch, Illinois 60002

Dear Ms. Shineflug:

This letter is to acknowledge receipt of your petition dated September 20, 1979, submitted on behalf of the Illinois Safe Energy Alliance, requesting that the Director of the Office of Nuclear Reactor Regulation institute public hearings on the decontamination of the Dresden 1 nuclear reactor.

Your petition is being treated under 10 CFR 2.206 of the Commission's regulations, and accordingly, appropriate action will be taken on your petition within a reasonable time. I enclose for your information a copy of the notice which is being filed for publication with the Office of the Federal Register.

Sincerely,

A handwritten signature in cursive script that reads "Harold R. Denton".

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
Notice

cc w/enclosure and
copy of petition:
See next page

Dupe
79-111505-14

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cc enclosure and copy of petition:

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Chicago, Illinois 60603

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Plant Superintendent
Dresden Nuclear Power Station
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Morris, Illinois 60450

U. S. Nuclear Regulatory Commission
ATTN: Jimmy L. Barker
P. O. Box 706
Morris, Illinois 60450

Susan N. Sekuler
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Environmental Control Division
188 W. Randolph Street
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Morris Public Library
604 Liberty Street
Morris, Illinois 60451

Chairman
Board of Supervisors of
Grundy County
Grundy County Courthouse
Morris, Illinois 60450

Department of Public Health
ATTN: Chief, Division of
Nuclear Safety
535 West Jefferson
Springfield, Illinois 62761

Director, Technical Assessment
Division
Office of Radiation Programs
(AW-459)

U. S. Environmental Protection
Agency
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U. S. Environmental Protection
Agency
Federal Activities Branch
Region V Office
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Chicago, Illinois 60604

Mr. D. Louis Peoples
Director of Nuclear Licensing
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

COMMONWEALTH EDISON COMPANY
 (Dresden Nuclear Power
 Station, Unit 1)

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Docket No. 50-10

REQUEST FOR ACTION UNDER 10 CFR 2.206

Notice is hereby given that by petition dated September 20, 1979, the Illinois Safe Energy Alliance requested public hearings be held on the decontamination of the Dresden Nuclear Power Station, Unit 1. This petition is being treated as a request for action under 10 CFR 2.206 of the Commission's regulations, and accordingly, action will be taken on the petition within a reasonable time.

Copies of the petition are available for inspection in the Commission's Public Document Room at 1717 H Street, N.W., Washington, D. C. 20555 and in the local public document room at Morris Public Library, 604 Liberty Street, Morris, Illinois 60451.

FOR THE NUCLEAR REGULATORY COMMISSION

Harold R. Denton
 Harold R. Denton, Director
 Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland
 this 30th day of October, 1979.

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I.S.E.A.

ILLINOIS SAFE ENERGY ALLIANCE

P.O. Box 469

Antioch, Illinois 60002

Meetings:

407 South Dearborn, Room 270

Chicago, Illinois 60605

September 20, 1979

PETITION FOR HEARINGS ON DECONTAMINATION OF DRESDEN I, Morris, Ill.

Dr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Denton,

Under the provisions of the U.S. Nuclear Regulatory Commission Rules and Regulations, Part 2.206, I, Marilyn Shineflug, with the support of members of the Illinois Safe Energy Alliance, request that public hearings be held on the decontamination of the Dresden I nuclear reactor near Morris, Ill. Since there is no assurance that the N.R.C. will decide to complete a formal Environmental Impact Statement for this experimental project, public hearings are needed to: 1) answer previously unanswered or inadequately answered questions; and 2) investigate the significance of new information regarding possible environmental and health effects of decontamination. Accurate, complete answers are needed to the following questions:

1. What effect(s) will the admittedly corrosive solvent NS-1 have on the reactor's piping system? As stated under Category A Technical Activity No. A-15, "The primary NRC concern related to the decontamination is to assure that the decontamination method does not degrade the integrity of the primary coolant system boundary. This consideration involves both immediate degradation during decontamination and latent effects that could cause degradation during subsequent operation of the reactor." How can all the crucial welds, valves and joints, etc., many of which are inaccessible, be inspected to assure decontamination has not caused damage?
2. What standards or guidelines will be utilized for "'baseline' inspection and appropriate followup inspections to provide a high degree of confidence that no degradation has occurred"? Reliance on existing Technical Specifications and "special inspections" seems inadequate in light of the following NRC admission: "Since this is an area [decontamination] where the NRC staff has limited expertise and experience with commercial nuclear power plants, it will be difficult to establish the necessary meaningful guidance and criteria for the decontamination of operating reactors in advance of these anticipated licensee submittals." (Emphasis added) To my knowledge the NRC has not yet published a NUREG Document

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on Decontamination and/or a Regulatory Guide which identifies acceptable methods of decontamination and establishes materials testing criteria that must be satisfied to qualify each decontamination method for licensing approval. Whether or not a Regulatory Guide has been published may be moot if Regulatory Guides are not enforceable. However, since the integrity of the primary coolant system is essential for protection of the public health, decontamination should not proceed until this important unresolved generic safety issue is resolved.

- 3) Whether or not decontamination wastes can accurately be classified as "low-level" remains unanswered. What radionuclides and in what concentrations are expected besides cobalt 58 & 60, cerium, manganese, zirconium and cesium? According to NRC information, 3000 curies of radioactive material will be removed and eventually placed in 1200 55 gallon drums. If the radioactive material is uniformly distributed throughout the solidification agent, one can conclude each barrel will contain 2½ curies of radioactivity or 12,500 nanocuries per gram. Can waste with this concentration of radionuclides be defined as low-level? What assurances does the public have that significant amounts of transuranics won't be present? According to Mr. Steve Lange of Commonwealth Edison, "transuranics are not expected," but apparently their presence cannot be ruled out. If the waste contains 10 or more "nanocuries of transuranic contaminants per gram of material," where will it be buried? Or will it remain at the Dresden site forever as stated by Mr. Lange?
4. What is the long term environmental impact of combining radioactive waste with chelating agents? As you know, Drs. Means, Crerar and Duguid found chelating agents to be the very agents responsible for radionuclide mobilization at Oak Ridge, Tenn. (See Science, Vol. 200, June 30, 1978) The NRC response that decontamination wastes from Dresden I will be buried in "dry" areas is not adequate in light of man's inability to predict climatic conditions over the long time spans this waste remains dangerous to life. Furthermore, radionuclides can leach out (in a manner similar to the operation of a flea collar) even in dry areas and be carried from original burial sites by scant amounts of rain water. At least one recent study shows radionuclide-chelate complexes are persistent over time and can readily be taken up by plants, etc.
5. How stable will the vinyl ester plastic resin be which is supposed to encapsulate the decontamination wastes? According to NUREG-0471, "There are no current criteria for acceptability of solidification agents." Therefore, what is the basis established by the NRC (and not Dow Chemical or Commonwealth Edison) for concluding this solidification process will be acceptable? What consideration has been given to the fact that organic solvents present in much radioactive waste can dissolve the Dow solidification agent?
6. What are the maximum levels of radiation exposure workers could receive while carrying out decontamination? What are the expected levels of radiation exposure workers may receive? If NS-1 is regarded as corrosive or a "strong chemical decontaminant," (NUREG-0410), how can it be claimed that "it is essentially non-irritating when applied directly to the skin or eyes..."? (Letter from D.C.E.)
6. How many truckloads of waste will have to be shipped and at what risk? This question has not been adequately answered because it is possible NS-1 will have to be flushed through the system more than once. According to Mr. Lange, the absorption capacity of the solvent may be taken up by iron instead of "crud" resulting in the production of twice as much waste.
7. What is the status of the NRC's consideration of the need for an Environmental Impact Statement for the Dresden I decontamination?

An early consideration of this request will be appreciated.

Phone: 312/395-1353

Sincerely, *Marilyn Shineflug*
Marilyn Shineflug, Co-Chair.

I.S.E.A.

ILLINOIS SAFE ENERGY ALLIANCE

P.O. Box 469

Antioch, Illinois 60002

Meetings:

407 South Dearborn, Room 370

Chicago, Illinois 60605

MEMBER GROUPS

APPLESEED, Braidwood, Ill.

ASSOCIATED CITIZENS FOR PROTECTION OF THE ENVIRONMENT,
Sheffield

CITIZENS AGAINST NUCLEAR POWER, Chicago

CITIZENS OPPOSED TO RADIOACTIVE POLLUTION, Highland Park

CHICAGO WOMEN FOR PEACE

DEKALE AREA ALLIANCE FOR RESPONSIBLE ENERGY

ILLINOIS CONSORTIUM ON GOVERNMENTAL CONCERNS, Springfield

ILLINOIS LEGISLATIVE COMMITTEE OF THE NATIONAL COUNCIL OF
JEWISH WOMEN

MCHENRY COUNTY DEFENDERS

PEACE AND JUSTICE CENTER, Wheaton

POLLUTION AND ENVIRONMENTAL PROBLEMS, Palatine

PRAIRIE ALLIANCE, Champaign, Bloomington, Charleston, Peoria
and Springfield

RELIGIOUS EDUCATION COMMUNITY, Wheaton

MISSISSIPPI ALLIANCE FOR THE ENVIRONMENT, Rockford

WAUKEGAN CITIZENS ACTION PROJECT

8TH DAY CENTER FOR JUSTICE

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LEAGUE AGAINST NUCLEAR DANGERS, Stevens Pt. Wis.

SAFE HAVEN, Sheboygan, Wis.