



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

~~SECRET~~
~~CONFIDENTIAL~~

MAY 29 1980

Docket No. 50-10

MEMORANDUM FOR: Chairman Ahearne
THRU: William J. Dircks (Signed) T. A. Rehm
Acting Executive Director for Operations
FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation
SUBJECT: DRESDEN DECONTAMINATION

Enclosed is our response to your memorandum dated February 27, 1980 which asked three specific questions:

1. What is being done at Dresden?
2. What type of approval did NRC give (license amendment)?
3. Did we do a negative declaration or environmental assessment?

As indicated in the enclosure, we have completed our review of the safety and environmental aspects of the proposed chemical decontamination at Dresden and expect to issue a draft environmental statement for comment by the end of the month.

Original Signed by
H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
Commissioner Gilinsky
Commissioner Kennedy
Commissioner Hendrie
Commissioner Bradford
SECY
OPE
OGC

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DRESDEN DECONTAMINATION

(1) What is being done at Dresden?

Since our 1975 authorization to initiate preparations for the Dresden Unit 1 decontamination, Commonwealth Edison Company (CECo) has completed construction of the support facilities necessary to carry out the decontamination in a safe and environmentally acceptable manner. CECo has also submitted all of the information required by the staff to satisfy the three conditions that were part of our earlier approval. We have prepared a safety evaluation and environmental evaluation for the decontamination project and are prepared to issue an approval to proceed with the decontamination.

We have received numerous requests from the public to prepare an Environmental Impact Statement (EIS) and to hold a public hearing on the decontamination project. Two of these requests have been accepted as petitions under section 2.206 of our regulations for action by the Commission. One of these by Ms. Kay Drey requests that we prepare an EIS and one by the Illinois Safe Energy Alliance (ISEA) asks for a public hearing. We have carefully reviewed the allegations made by these petitioners and have reassessed the environmental impact of the project and have concluded, as we concluded in 1975, that the decontamination will not adversely impact the environment. Based upon the recent Commission decision requiring that an EIS be prepared for the Surry steam generator replacement action, we have decided to convert our environmental appraisal into draft environmental statement.

A significant amount of the public's interest in the decontamination has been focused on the waste shipment and disposal aspects of this activity. We have contracted with Brookhaven National Laboratory through NMSS to evaluate the effect of decontamination chemicals on the integrity of the shipping containers that will be used to transport and bury the Dresden decontamination wastes. The preliminary results of the Brookhaven study support our previous determination that these wastes can be safely shipped off site for burial. NRC has notified the public (43 FR 49811) that an Environmental Impact Statement supporting our Proposed Rule 10 CFR 61 which will implement a specific regulatory program for the management of low-level radioactive waste. This statement offers the public an opportunity to comment on the generic aspects of the disposal of decontamination wastes.

In light of the proposed changes to Part 51 which will require that we consider occupational exposures when determining whether to prepare Environmental Impact Appraisals, we have also evaluated the occupational exposure that will be associated with the decontamination. Commonwealth Edison Company (CECo) submitted a detailed Man-Rem estimate for the project in compliance with the ALARA requirements of 10 CFR 20. In this estimate CECo concluded that approximately 500 Man-Rem would be received by its employees and contractors. We reviewed CECo's estimates and concluded that they were well based and conservatively bounded the expected occupational exposures that would be received.

CECo has recently reported that the occupational exposures experienced have been even lower than the earlier estimates because of careful planning. CECo now projects a total Man-Rem exposure of about 300 Man-Rem for the entire project.

From 1973 through 1977 the occupational exposure at Dresden station has averaged 627 Man-Rem per year per reactor. The annual exposures ranged from 313 to 1141 Man-Rem per year per plant. These annual exposures show that the occupational exposures exhibit a range around the average of minus 314 Man-Rem per plant per year to plus 514 Man-Rem per year per plant. It is readily seen that the anticipated occupational exposure of 250 to 500 Man-Rem from the Dresden decontamination falls well within the range of variations that has been historically found at Dresden Station and other operating reactors. Therefore, the occupational exposure anticipated due to the decontamination project does not differ significantly from the normal range of exposures at the station from year to year.

All aspects of our reassessment, including preliminary reports from Brookhaven, support our previous finding that this decontamination does not adversely impact the environment.

Because this issue has been the subject of significant public inquiry, we are also considering holding a public meeting in the Dresden vicinity to explain our action and inform the public of the results of our evaluation.

We met with staff members of the Council on Environmental Quality on February 14, 1980. We provided them with the background and status of this action and discussed our proposed approach to this issue.

The completion of our review of this action involves not only the decontamination but also the review of the inspections prior to return to operation. We will be determining whether or not to impose license limitations or conditions on the actual conduct of the decontamination work or in connection with the resumption of operation thereafter.

- (2) What type of approval did NRC give (license amendment)?

Commonwealth Edison had originally planned to carry out the decontamination under the provisions of 10 CFR 50.59 which allow the licensee to make changes in the facility if the changes do not involve a change in the Technical Specifications or an unreviewed safety question. The staff, identified neither technical specification changes needed nor unreviewed safety questions. However, because of ACRS and staff concerns related to the potential for causing pipe cracks and some previous decontamination project misfortunes, we informed CECO that we wished to be kept closely informed about the progress of the decontamination program.

Because of the 36 million dollar cost associated with the decontamination project, CECO agreed to provide NRC with a licensing request for our approval. CECO felt that the request would be a prudent action to assure that the staff have an early opportunity to express any licensing concerns that might impact the viability of the project.

On December 9, 1975 we issued a letter which conditionally authorized the initiation of the decontamination program at Dresden. The authorization indicated that our review to that point had concluded that the decontamination could be conducted with reasonable assurance that the health and safety of the public would not be endangered.

- (3) Did we do a negative declaration or environmental assessment?

Our 1975 authorization to initiate the chemical decontamination did not involve a license amendment or other federal action subject to NEPA review. We did assess the environmental impact of the proposed decontamination and concluded that there would be no adverse environmental impact. Accordingly, we did not prepare a Negative Declaration and Environmental Impact Appraisal. Our December 9, 1975 letter, copy enclosed, only authorized preparation for the proposed chemical decontamination. Our environmental assessment of the program was summarized in Section 1 of the related Safety Evaluation. As stated earlier we are preparing a draft Environmental Statement for this action and expect to issue it by the end of May.