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FROM: Arkansas Power & Light Co. Little Rock, Ark William Cavanaugh III		DATE OF DOC 6-2-75	DATE REC'D 6-4-75	TR xxx	TWX	RPT	OTHER
TO: Mr. A. Giambusso		ORIG 1-signed	CC	OTHER	SENT AEC PDR <del>xxxx</del> SENT LOCAL PDR <del>xxxx</del>		
CLASS <del>xxxxx</del>	UNCLASS	PROP INFO	INPUT	NO CYS REC'D	DOCKET NO: 50-313		

**DESCRIPTION:**

Ltr ref our 5-15-75 ltr ... trans the following:

THIS DOCUMENT CONTAINS  
POOR QUALITY PAGES

**ENCLOSURES:**

Attachment to Letter Cavanaugh to Giambusso  
June 2, 1975..... Objection to 5 items  
of the draft Amdt No. 3, change No. 3  
to the Enviro Tech- Specs .....

PLANT NAME: Arkansas #1

**FOR ACTION/INFORMATION**

6-4-75 JGB

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to Lic Asst Williams

8004290 549

P



HELPING BUILD ARKANSAS

ARKANSAS POWER & LIGHT COMPANY

9TH & LOUISIANA STREETS • LITTLE ROCK, ARKANSAS 72203 • (501) 372-4311

June 2, 1975

Handwritten initials 'F' and 'V'.



Mr. A. Giambusso, Director  
Division of Reactor Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Arkansas Power & Light Company  
Arkansas Nuclear One-Unit 1  
Docket No. 50-313  
License No. DPR-51  
Environmental Technical Specifications

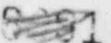
Dear Mr. Giambusso:

Mr. Muller's letter of May 15, 1975 transmitted a draft of Amendment No. 3, Change No. 3, to the Technical Specifications of Operating License DPR-51. We take definite objection to 5 items that are a part of that Amendment.

First, we object to impingement sampling 3 times per week. We have already stated in our April 11, 1975 submittal of proposed changes to Environmental Technical Specifications that, among other things, hard data shows only a 2% difference in results obtained from 3 times per week sampling as opposed to the existing practice of twice per week sampling. We feel that the NRC staff has failed to properly justify a 3 times per week sampling schedule and that the cost far outweighs the benefit.

Second, we object to Specification 6.4 regarding the absolute population density determination of threadfin shad. Numerous reasons for our objections were voiced in our April 11 submittal including the position voiced by state agencies. We feel that the NRC staff has not considered adequately all of the facts presented, has failed to properly justify their requirement for this program, and that the cost far outweighs the benefit.

Third, we object to Specification 6.5 regarding the laboratory study of effects of temperature and temperature change on the swim-speed and mortality of threadfin shad. Again, our April 11 submittal includes numerous reasons for our objections which have not yet been addressed to our knowledge. In addition our February 14, 1975, submittal, referenced in our April 11 submittal, cited other studies which have already been done to determine these



temperature effects. We feel that the NRC staff has failed to properly justify their requirement for this study based on the facts we have presented and that the cost far outweighs the benefit.

Fourth, we object to Specification 6.3 regarding diel changes in impingement levels. Again, our April 11 submittal includes our reasons for considering this of no use. To our knowledge no attempt has been made to refute our contentions. We feel that the NRC staff has failed to properly justify their requirement in this area and that the cost far outweighs the benefit.

Fifth, we object to ceasing all fish grinding operations. Our April 11 submittal proposed a program to detect any deleterious effects caused by fish grinding and to stop grinding only when these effects were detected. We have also cited strong objections by a state agency to ceasing fish grinding operations. We feel that the NRC staff has failed to properly justify their requirement to cease all fish grinding operations.

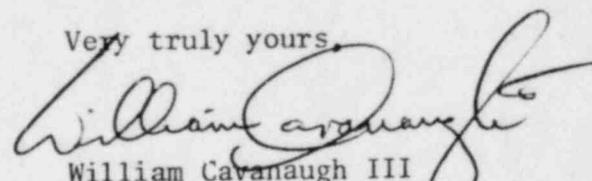
We also object, in general, to the unilateral decisions of the NRC in imposing arbitrary provisions in our Environmental Technical Specifications which may be incompatible with current EPA directives relative to the NPDES permit proceedings. We feel that consultation from EPA should be obtained in this matter before new provisions are imposed.

On a smaller scope we have other more detailed comments, questions, and objections which are included as an attachment to this letter.

Mr. Muller's letter also stated that our previous submittals demonstrating that the inlet water box temperature is representative of the temperature existing in Illinois Bayou are incomplete. We have not as yet been told how they are incomplete nor exactly for what purpose they are needed. If we can be told how they are incomplete or exactly for what purpose they are needed we may be able to supply further data that is sufficient.

In conclusion, we wish to take exception to the five points listed above and are prepared to meet with you or members of your staff to discuss our objections.

Very truly yours,

  
William Cavanaugh III  
Manager, Nuclear Services

WC:ay

Attachment to Letter  
Cavanaugh to Giambusso  
June 2, 1975

1. General

Unchanged backsides of changed pages should be included in the amendment to assure that the change can be properly inserted in the existing Environmental Technical Specifications.

2. p. 2-3 Specification 2.1.4

There is a typographical error in the second word in the third from the last line in the first paragraph of the specification.

3. p. 2-10 Specification 2.4.1.2

Our letter to you of June 17, 1974, which requested this change, also requested that the wording be changed so that the releases would be totaled over a calendar quarter instead of averaged since this is a quarterly limit. To accomplish this, the word "averaged" in the second line of this specification should be changed to "totaled".

4. p. 2-17 Table 2-2

a. Item 2 is covered in the Appendix A Technical Specifications and has nothing to do with liquid releases; therefore, it should not be in this table.

b. Strontium 89 and 90 determinations are done by chemical separation. Chemically, Strontium 89 and 90 are inseparable; therefore, one cannot be done without the other. We are required to account for Strontium 89 and 90 in liquid releases monthly; therefore, item 1 should be done on a monthly proportional composite sample compiled from all liquid releases. We also have to report Strontium 89 and 90 in gaseous effluents monthly; therefore, the frequency of the analysis required by item 4.b.4 should be changed to monthly for both Strontium 89 and 90. Also, the filters are dissolved in the analysis; therefore Strontium 89 and 90 must be done at the same time.

c. There are now two items numbered 4.b. This should be rectified.

d. Specification 2.4.2.8 duplicates the requirements of item 4.c.1 with the exception that specification 2.4.2.8 is more restrictive concerning frequency. Therefore, item 4.c.1 should be deleted from Table 2-2 and, since footnote (5) only applies to item 4.c.1, footnote (5) should also be deleted.

e. For clarification, the first line of footnote (1) should refer to Specification 2.4.2.3.b and following the words "maximum release rate" in line 3 of footnote (1) a reference should be made to Specification 2.4.2.3.a.

- f. The words "Air Ejector" on item 6 are not applicable and should be deleted.
- g. Please provide the bases for the sensitivity specified for item 4.b.3.

5. p. 4-11 & 12 Specification 4.1.2.a (2)

a. Objective

The objective as stated is directed toward academic interest only. It should be reworded to address a qualitative assessment of environmental impact.

b. Specification

It was our impression that this specification applied to fish impingement. Including all impinged organisms creates difficulties for our personnel. While these difficulties (mostly additional paperwork) are some that we could probably live with we feel that the benefit from including the occasional snakes, turtles, crawfish, etc., are not worth the additional effort.

The wording requires that we search the entire sample to find any single representative of any species. The third sentence should apply to the subsample only. Since this is already specified later, the third sentence should be deleted.

Our April 17 submittal attempted to clarify the relationship of trash to the subsample. As stated in the draft Amendment No. 3 the wording is confusing as to what makes up the subsample. We believe our April 17 submittal is much better on this point.

Our April 11 submittal specified methods for subsampling within a species. Draft Amendment No. 3 simply states that "a random subsample of at least 100 fish shall be used". The method for taking a random subsample should be specified with a minimum much lower than 100 fish. We believe the methods specified in our April 11 submittal are more appropriate.

The subjects of fish grinding and the number of days of sampling in each week have been addressed in the main body of this letter.

c. Reporting Requirement

We need at least 30 days to supply the monthly information requested. At times a 30 day requirement will be difficult to meet.

d. No basis is given for this specification. One is definitely needed.

e. As a general comment to this specification we feel that the version we submitted on April 17, 1975, is much more specific and therefore easier to implement and to enforce. The amendment 3 version is poorly worded. As a result we again submit that our version be adopted.

6. p. 4-12 & 4-12a Specification 4.1.2.a(3)  
The second sentence should be changed to read "Intake samples shall be taken in the intake canal; discharge samples shall be taken from the discharge canal." This will facilitate sampling the same water mass and enable use of the intake structure for intake sampling. The paragraph at the top of page 4-12a should be revised to make the metered plankton net the first choice and the high capacity pump sampler the alternative since the results of both methods should be essentially identical and the netting method is less expensive. The reporting requirement should require the summary to be included in "the report required by Specification 5.6.1".
7. p. 4-15 Specification 4.2.10  
For the quantities of milk (2 liters) that we are able to put through a column in a reasonable amount of time (300 minutes), counting 2 1/2 days after sample collection, 70% chemical yield, and 33% detector efficiency, the overall error allowable in determining the radioiodine concentration should be raised to  $\pm 35\%$ . The last two lines on this page should be changed to read "after notifying the NRC in writing that milk is not available at that location." We are not always able to obtain milk even where milk animals are present.
8. p. 4-29 Table 4-3
  - a. The gill net survey sampling frequency should be changed to agree with the text.
  - b. We would like an explanation of why the sampling points for the trawling survey and the shoreline seine survey were not changed to sampling areas. We feel that areas are more meaningful on netting operations as we do not understand how nets ca. be pulled at a single point.
9. p. 6-3 Specification 6.3  
What is the meaning of the word "diel"? We cannot provide an interpretive report within 30 days of the end of the program. We need at least 60 days. No basis has been provided for this specification and no justification as to the benefits and use of the results has been provided as noted in the main body of this letter.
10. p. 6-4 Specification 6.4  
Exception to this entire specification has been taken in the main body of this letter. In the continuing development that is being made of this program it has been determined that doubling the grids and deleting the replicates will yield better results. Therefore this should specify 50 grids and not require replicate samples.
11. p. 6-5 Specification 6.5  
The control group is used to differentiate natural mortality. Due to a typographical error, we are now asked to differentiate natural morality. Exception to this entire specification has been taken in the main body of this letter.