

Minnesota Pollution Control Agency

December 1, 1975

870-7112

Mr. R.S. Boyd, Acting Director
Division of Reactor Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Prairie Island Nuclear Generating Plant (Docket Nos.
50-282 and 50-306, License Nos. DPR-42 and DPR-60)

Dear Mr. Boyd:

The Minnesota Pollution Control Agency, an intervenor in the ongoing licensing hearing for the Prairie Island Nuclear Generating Plant, has received a copy of an Unusual Event Report from the Licensee dated November 14, 1975.

The Report indicates that the release rate of long-lived halogens and particulates, when averaged over a three-month period and extrapolated at the same release rate for one year, was greater than two times the Design Objective contained in Technical Specification 3.9.2.b. Our review of Technical Specification 3.9.B.1.a indicates that in such circumstances the Licensee is required to identify the cause for such excessive release rates, and to define and initiate a program to reduce the rates. In spite of the rather specific language of that section, the Licensee has failed to make an adequate identification of the causes and to develop a program to reduce the excessive releases.

It has long been the position of the Minnesota Pollution Control Agency, in this proceeding as well as in the Monticello licensing proceeding and the Appendix I rulemaking hearing, that routine releases of radioactive plants can and should be significantly reduced. In this instance, the Agency has the following specific concerns:

1. Further explanation of the cause of this excessive release of halogens and particulates is required. The only explanation given by the company is that "abnormal amounts of I-131 and Co-58 were released from Unit 1 Containment" as a result of "required purging to permit maintenance." It is of concern to the Agency that routine maintenance would cause the release of excessive amounts of radioactive gaseous materials. If extra purging is necessary due to steam leaks in the containment or other causes, this should be fully investigated.

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2. Information should be provided as to the extent to which materials released during maintenance purges are treated in the plant's gaseous emission treatment system. If such releases are not treated, explanation and justification should be provided.

3. Technical Specifications 3.9.B.1.a and 6.7.B.2 require written Unusual Event Reports to be submitted "within 30 days." Submission of such a report on November 14 identifying excessive release rates from May 11, 1975, through August 10, 1975, does not seem timely.

4. The Minnesota Pollution Control Agency does not believe that, merely because there is some delay in the ultimate implementation of Appendix I, the Licensee should be allowed to violate the provisions of its existing Technical Specifications with impunity.

The Minnesota Pollution Control Agency requests that the Nuclear Regulatory Commission take immediate and meaningful action to insure that the concerns expressed above are addressed.

Sincerely



Peter L. Gove
Executive Director

cc: Jay Silberg, Esq.
O. Gregory Lewis, Esq.
L.O. Mayer