

GENERAL ELECTRIC

PDR 70-1113

NUCLEAR ENERGY
PRODUCTS DIVISION

WILMINGTON MANUFACTURING
DEPARTMENT

May 19, 1980

CASTLE HAYNE ROAD • P. O. BOX 780 • WILMINGTON, N. C. 28401 • (919) 343-5000

Director
Office of Nuclear Material Safety & Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. W. T. Crow, Section Leader
Uranium Process Licensing Section

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U.S. NUCLEAR REGULATORY COMMISSION

Dear Sir:

Reference: NRC License SNM-1097, Docket #70-1113

Subject: Application Amendment N-6, Related to Environmental
Monitoring of Plant Gaseous Effluents

With reference to activities authorized by SNM-1097 at the GE fuel fabrication plant in Wilmington, N. C., your office issued Amendment #11 to SNM-1097 on January 28, 1980. This amendment imposed additional requirements upon General Electric related to environmental monitoring of plant gaseous effluents.

As a result of our recent discussions with you and your staff, General Electric hereby requests some changes and additions to the conditions specified in Amendment #11, for the purpose of clarifying the requirements in this amendment. Details of the requested changes or additions are contained in the attachment to this letter.

Pursuant to 10 CFR 170.31, attached is a General Electric check for \$150 to cover the processing of this amendment request.

General Electric would be pleased to discuss this matter further with you and your staff as you may deem necessary.

Very truly yours,

GENERAL ELECTRIC COMPANY

Arthur L. Kaplan

Arthur L. Kaplan, Manager
Licensing & Compliance Audits



Applicant.....	M/C J26
Check No. <i>885246</i>	
Amount/Fee Category <i>\$140-1B</i>	
Type of Fee <i>admin</i>	
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Attachments
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The following are the changes or additions requested by General Electric Company for Amendment #11 to License SNM-1097, for the purpose of clarifying the requirements in this amendment:

CONDITION 3

A. Present Statement of License Condition

"Air sampling stations shall be installed and operated in the prevailing wind direction, i.e., N, S, SW and NE (locations should be near the fence lines).

Air samples shall be collected continuously and in addition to the gross alpha analysis, the samples at each location shall be composited and analyzed on a monthly basis for uranium isotopes with an analytical sensitivity of at least 10^{-16} $\mu\text{Ci/ml}$."

B. Requested Addition

We are requesting that an implementation date of 10/17/80 be added to this condition.

CONDITION 4

A. Present Statement of License Condition

"If the results of the sampling program indicate an airborne uranium concentration of greater than 3.45×10^{-15} $\mu\text{Ci/ml}$, the licensee shall, within 30 days, institute an air sampling program at the site boundary in the direction of the nearest resident to determine the particle size distribution of radioactive material with a cascade impactor of multiple stages covering nonrespirable and respirable particle size ranges.

The particle size distribution analysis may be performed on a semi-annual basis."

B. Requested Additions & Changes

We are requesting the addition of the phrase "after receiving analytical results" after the phrase "within 30 days" in the first part of this license condition so that it might read:
" ... the licensee shall, within 30 days after receiving analytical results, institute an air sampling program ...".

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We are also requesting that the basis for need of particle size distribution measurements be an average quarterly result, rather than a monthly result, of greater than 3.45×10^{-15} $\mu\text{Ci/ml}$.

CONDITION 5

A. Present Statement of License Condition

"Samples taken at the station in the southerly location, shall be composited quarterly and analyzed for uranium solubility. The solubility analysis shall follow the methodology and procedures established by Battelle Pacific Northwest Laboratories or an equivalent method acceptable to the NRC.

If a laboratory other than BNWL is used for the analysis, the licensee shall provide the NRC with a split sample so that the NRC can perform a verification analysis."

B. Requested Change

We are requesting that this condition be changed so that analysis for uranium solubility need only be done if the results of the sampling program at the fence line indicate an airborne uranium concentration averaged over a gallon a quarter of greater than 3.45×10^{-15} $\mu\text{Ci/ml}$ (the same as the requirement for particle size distribution analysis).

In addition to the above, discussions with you and your staff were held related to "parameters important to a dose assessment change" as referred to in Condition #1 of Amendment #11. In particular, we were concerned with examples of what some of these parameters might be. The following were stipulated as typical, resulting from our discussions:

1. Location of the "nearest resident" changes to an area closer to our fence line (i.e., someone moves closer to the fence line than our present "nearest resident").
2. A fence line dose is measured which is larger than that calculated.
3. Someone uses the land next to the fence line for something like farming or for grazing cattle. (This would require a change in the ingestion pathway - bone dose would need to be considered in this case, since the only ingestion pathway considered was inhalation of airborne uranium, based upon present use of land around our site.)

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There were no other apparent "parameters important to a dose assessment change" which were evident at this time, primarily because the most conservative solubility and particle size distributions were used in the NRC calculations of our fence line dose and of the annual dose to the nearest site resident.

This list is by no means meant to be inclusive, but is representative of the kinds of considerations to be taken in satisfying this aspect of License Condition #1 in Amendment #11.

A. L. Kaplan
:bmw

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