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1881 - 1981

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

November 5, 1981

Re: Docket Nos. 50-277
50-278



Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Response to an NRC Request for Information Regarding Nureg 0737, item II.F.1, attachment 2

Dear Mr. Eisenhut:

This letter provides a response to an NRC staff request for information on Nureg 0737, item II.F.1, attachment 2, dealing with radioiodine sampling criteria. The staff requested that we assess the capability of plant personnel to remove iodine cartridge and particulate samples, replace sampling media, and transport the samples to the onsite analysis facility with radiation exposures that are not in excess of 5 rem whole-body exposure and 75 rem to the extremities for the duration of the accident.

A letter dated December 22, 1980 (S. L. Daltroff to D. G. Eisenhut) states that Philadelphia Electric Company's plans for addressing the exposure dose would be submitted following clarification of the in-plant airborne dose source term by the NRC. However, since the clarification has not been provided, an analysis was performed to evaluate accessibility to the existing building vent iodine monitor locations utilizing FSAR Design Basis - Loss of Coolant Accident assumptions. It was determined that airborne concentrations of radioactivity utilizing these assumptions as well as direct shine from equipment utilizing Nureg 0737 source terms does not prohibit personnel access to the iodine monitors following an accident. However, transporting and analyzing the samples is currently prohibited by the sample media

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radiation level of 500 R/hr at one foot based on the NRC's shielding design basis in Nureg 0737.

In order to meet the NRC criteria, improved sampling capabilities will be provided on both the off gas stack and reactor building vent monitoring systems. This will include the use of shielded sample collection devices, special handling tools, shielded transport container, and special high level measuring techniques. The existing procedures for removing, transporting, and analyzing hot samples will be revised as necessary. The proposed schedule for completing this effort is June 30, 1982. This schedule is based on the expected delivery of equipment.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,