



DOCKET NUMBER **PR 2,50454**
PROPOSED RULE **(55 FR 29043)**

STATE CLEARINGHOUSE
State of Ohio - Office of Budget and Management

(46)

30 EAST BROAD STREET • 34TH FLOOR • COLUMBUS, OHIO 43266-0411 • (614) 466-0697 / 0698

90 OCT 15 AM 10:46

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

September 28, 1990

U.S. Nuclear Regulatory Commission
Secretary of Commission, Docketing/Svc. Branch
Washington, DC 20555

Attn: George Sege

RE: Rin 3150-AD04 Proposed Rule - Draft, Regulatory Analysis for Proposed Rule on Nuclear Power
Plant License Renewal, Nureg-1362/1398/1411 & 1412, Start Date 07/90, 12 Months Duration
State Application Identifier Number (SAI): OH900726-0282-99999

Dear Applicant or Funding Agency:

Our office has recently notified you that the intergovernmental review has been completed with respect to the above referenced project. We have either recommended that the applicant proceed with the application for appropriate funding or that they must address concerns generated through the review process.

We have now received additional comments from the Ohio Environmental Protection Agency (see attached). Contact must be made with the commenting agency and these comments must be taken into consideration as you proceed with the application process.

If you have any questions concerning the attached, please contact our office, (614) 466-0697 or (614) 466-0698. NOTE: If your application completion letter contained negative or conditional comments, they are still valid and, if not resolved, need to be satisfactorily addressed.

Sincerely,

Larry W. Weaver *L.W.*
State Federal Funds Coordinator
Office of Budget & Management

cc: WITHOUT ATTACHMENTS
Ohio Environmental Protection Agency

9010240039 900928
PDR PR
2 55FR29043 PDR

DS10

OFFICE OF BUDGET AND MANAGEMENT
STATE CLEARINGHOUSE TRANSMITTAL

30 E. Broad St., 34th Floor
Columbus, Ohio, 43266-04
Phone (614) 466-0697 / 0691

STATE APPLICATION IDENTIFIER NO: OH900726-0282-99999
RESPONSE ON 60 DAY REVIEW SHOULD BE RETURNED 15 DAYS PRIOR TO CLEARANCE DATE OF: 90-09-26
FOR FULL APPLICATION CALL BY : 8/6

APPLICANT: U.S. NUCLEAR REGULATORY COMMISSION
ADDRESS: SECRETARY OF COMMISSION, DOCKETING/SVC BRANCH
CITY: WASHINGTON STATE: DC ZIP: 20555-0000
ATTENTION: GEORGE SEGE PHONE: (301) 492-3917

PROPOSED FEDERAL FUND: \$00
PROPOSED TOTAL FUND : \$00

PROJECT : RIN 3150-AD04 PROPOSED RULE - DRAFT

PROJECT DESC: REGULATORY ANALYSIS FOR PROPOSED RULE ON NUCLEAR
POWER PLANT LICENSE RENEWAL, NUREG-1362/1398/1411 &
1412, JULY 1990

REVIEW AGENCY: DEPARTMENT OF AGRICULTURE
DEPARTMENT OF DEVELOPMENT
DEPARTMENT OF NATURAL RESOURCES
DEPARTMENT OF HEALTH
DEPARTMENT OF TRANSPORTATION
OH ENVIRONMENTAL PROTECTION AG

COPIES 27 PM 1:57

RECEIVED
OCT 01 1990
State Clearinghouse
Budget & Management

Reviewing agency must complete this section.

COMMENTS - attach another sheet. Comments cited in this Section must include (1) Identification of reviewing agency's statute or specific plan or program related to this proposal; (2) Description of impact of this proposal on identified plan or program; (3) Reviewer's recommended changes for or additions to the proposal. Please type all comments and include SAI number on your comment sheet.

REVIEWING AGENCY POSITION ON PROJECT (Mark one only)

- No comment.
- Clearance of the project should be granted.
- Clearance of the project should not be delayed, but applicant should answer the reviewer's questions or concerns. See enclosed comments.
- Clearance of the project should only be granted on the condition that the applicant use the recommendations in the enclosed comments. (Executive or Deputy Director Signature Needed.)
- Clearance of the project should be delayed until the applicant has satisfactorily addressed the concerns stated in the enclosed comments. (Executive or Deputy Director Signature Needed.)

PLEASE TYPE THE FOLLOWING INFORMATION:

Reviewer's Name Z. Clayton
 Agency Name Ohio EPA Div Emergency & Remedial Res.
 Street 1000 Watermark Dr City Cols State OH
 Address 1000 Watermark Dr
 Phone (614) 644-2264 Zip Code 43266-0149

Executive or Deputy Signature
OBM 6005 (Rev 8/87)



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

TO: Hari Ruiz, DWQPA, IGR Coordinator

FROM: Zack A. Clayton, DERR-Compliance, Radiological
Response Coordinator

SUBJECT: IGR Review of Nuclear Power Plant License Renewal,
Proposed Rule.

DATE: August 1, 1990

I see no major problems with this proposed rule. Current license requirements would continue in force with possible additional requirements imposed due to age-related degradation of plant components and parts. The license renewal requires a complete plant assessment, development of plan to deal with plant aging, a public hearing process, and ability for public challenge if any existing requirement is relaxed because of age of the plant or difficulty of compliance with the requirement.

There is no requirement for a licensee to be in compliance with its current license. However, it is difficult to see how a licensee could be out of compliance over the anticipated three year period of license renewal and not have its current license revoked. Flagrant violation of license requirements, and/or significant safety violations have resulted in loss of license in the past and would make passage of the renewal difficult if not impossible.

Specific Questions

(1) Generating equipment and other transmission related electrical equipment in the switchyard should be exempt from review as they are not part of the nuclear island and are not in contact with any part of the functional nuclear system. This exclusion would not apply to the turbine equipment, especially in a BWR.

(2) No equipment items or categories appear to be neglected in the proposed rules. However, depending on plant location, biofouling may need to be addressed and the geologic setting may need to be re-evaluated due to changes in erosion or sediment deposition patterns, new or reactivated fault zones, and volcanic activity.



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

September 29, 1990

Ms. Linda Wise
Administrative Assistant
State Clearinghouse
State Office Tower
30 East Broad Street, 39th Floor
Columbus, Ohio 43266-0411

Dear Ms. Wise:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the project(s) received through the Intergovernmental Review Process and has developed the enclosed comments for the following project(s):

OH900824-0433-10148
OH900905-0479-14219
OH900914-0551-10418
OH900914-0555-66418
OH900726-0282-99999

Please forward these comments to the project applicant(s) on our behalf.

If you have any questions, please do not hesitate to contact me at 644-2149.

Sincerely,

Hari Ruiz, Environmental Impact Statement Review Coordinator
Division of Water Quality Planning And Assessment

1250P/20

Enclosure

cc: File