

# NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

November 15, 1978

TO ALL PRESSURIZED WATER REACTOR LICENSEES

Gentle en:

In a letter from B. Grimes, Assistant Director for Engineering and Projects, dated July 11, 1978, you were sent guidance and a submittal schedule which requested a license amendment application to be submitted to incorporate the requirements of 10 CFR Part 50, Appendix I into your facility Technical Specifications. Since that time, the staff has continued its efforts to simplify the specifications through clarification of intent and the removal of unnecessary requirements. In conjunction with these efforts we have had a number of discussions with the AIF and others concerning comments and questions they developed with respect to the specifications. As a result of our continuing review. we have made substantive revisions to the Draft Radiological Effluent Technical Specifications (NUREG-0472, PWR and NUREG-0473, BWR), which were forwarded to you in July. Although these specifications have been extensively revised, they still incorporate the fundamental requirements and concepts contained in the original documents. The major difference in these specifications from the previous ones is the removal from the specifications of the equations for dose calculations, setpoint determination and meteorological dispersion factors. These items, along with some miscellaneous items, are now required to be included in an Offsite Dose Calculation Manual (ODCM) to be prepared by the licensee and provided to NRC for review and approval along with your proposed Technical Specifications.

To assist you in preparing your submittal, we have enclosed a copy of Revision 1 of the Draft Radiological Effluent Technical Specifications. We have also enclosed for your use a copy of NUREG-0133, Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants. This NUREG document describes methods acceptable to the staff for the calculation of certain key values required in the preparation of the proposed effluent Technical Specifications.

In order to provide additional time to address this guidance, you may use the revised submittal schedule shown in Table I. The submittal dates are referenced to the date of this letter.

In addition to the guidance noted above, the following general information is also provided:

- The format for the revised Technical Specifications may be that presently used for your existing Appendix A Technical Specifications, provided all applicable areas of the model Technical Specifications are acceptably addressed. Although the staff recommends the format of the model Technical Specifications, its use is not mandatory.
- It has been misinterpreted by several licensees that the Technical Specification submittal need only address the individual dose design objectives of Appendix I. The submittal request must implement 10 CFR Part 50, Section 50.36a, Technical Specifications on Effluents from Nuclear Power Reactors which addresses the maintenance and use of radwaste equipment installed pursuant to Section 50.34a(a), Section 50.34a which addresses Appendix I (Design Objectives IIA, IIB, IIC and IID), 10 CFR Part 20, 10 CFR Part 50, Appendix A, General Design Criteria 60 and 64 which address the control and minitoring of releases of radioactive material to the environment, and 40 CFR Part 190, Uranium Fuel Cycle Standard. Consequently, the NRC expects the submittals to reflect these and other issues addressed in the Draft Radiological Effluent Technical Specifications enclosed with this letter.
- 3) The submittal should consolidate the radiological effluent and environmental monitoring Technical Specifications in Appendix A of the Technical Specifications. Consequently, if your facility presently has radiological effluent or radiological environmental monitoring Technical Specifications in Appendix B, you should request that they be deleted upon approval of the new Technical Specifications in Appendix A. The submittal should resolve all duplicative Technical Specification requirements in the radiological area.
- 4) The entire Administrative Controls Section (6.0) of the Standard Technical Specifications was included for information. Only those areas related to radiological effluents and environmental monitoring need be considered for inclusion into the license amendment request. However, if you desire to convert your entire Administrative Controls Section to incorporate the STS requirements and format the staff could handle this as a separate request.

To further assist you in the preparation of your submittal the NRC will conduct a one-day seminar on the Draft Radiological Effluent Technical Specifications at four of our Regional Offices. The dates and locations of the seminars are shown in Table II. Representatives from the Office of Nuclear Reactor Regulation will make the presentation and the agenda will include an introduction and background on the effluent Technical Specifications, the development of the Standard Technical Specifications, and the method and schedule for implementing the specifications. A question and answer period will follow the prepared presentation. More specific information relative to these seminars will be forthcoming from our Regional Directors.

Sincerely,

Brian K. Grimes, Assistant Director for Engineering and Projects

Division of Operating Reactors

#### Enclosures:

1. Tables I & II

 Draft Radiological Effluent Technical Specifications - PWR

3. NUREG-0133

TABLE I

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

LICENSEE SUBMITTAL DATES

30 Days	60 Days	90 Days	120 Days
Farley Hatch	Big Rock Point Ginna Haddam Neck La Crosse Oyster Creek San Onofre Surry Yankee Rowe	Arkansas Brunswick Crystal River Dresden Fitzpatrick Indian Point Millstone Monticello Nine Mile Point Oconee Peach Bottom Pilgrim Quad Cities Robinson Turkey Point Vermont Yankee Zion	Beaver Valley Browns Ferry Calvert Cliffs Cook Cooper Davis Besse Duane Arnold Fort Calhoun Humboldt Bay Kewaunee Maine Yankee North Anna Palisades Point Beach Prarie Island Rancho Seco Salem St. Lucie Three Mile Island Trojan

#### TABLE II

## REGIONAL SEMINARS ON DRAFT RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

November 28, 1978 - Region III

December 1, 1978 - Region IV & V (In Region V)

December 5, 1978 - Region II

December 8, 1978 - Region I

### Portland General Electric Company

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Columbia County Courthouse Law Library, Circuit Court Room St. Helens, Oregon 97501

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