UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C.

November 20, 1981

Dr. Sudhakar Pandey
Franklin Research Center
Benjamin Franklin Parkway
at Twentieth
Philadelphia, Pennsylvania 19103

Dear Dr. Pandey,

As a result of our recent meeting with the Atomic Industrial Forum working group, it has been decided that the following changes could be made in the RETS requirements.

First, the requirement of 3.11.2.3 to account for doses from C-14 may be dropped. Our data show that C-14 will not make a significant contribution to the doses.

Second, the requirement of 3.11.2.1 for limiting dose rates from airborne releases of radioiodines and particulates may be limited to the inhalation pathway only. This specification is intended to ensure compliance with the 20.106 limits which are maximum permissible concentrations based on inhalation (and submersion) doses.

Third, the requirements of 3.11.1.2, 3.11.2.2, and 3.11.2.3 for reporting, etc., when an offsite dose exceeds one half an annual design objective in one quarter, may be changed to require consideration of doses during the remainder of the calendar year (rather than "the subsequent three calendar quarters"). This change is consistent with the requirements of Appendix I which are based on the calendar year.

Fourth, action provisions may be added that reduce reporting requirements other than those specified in the model RETS. For plants with standard Tech Specs, this may be achieved by adding an action statement such as: "The provisions of Specification 6.9.1.9.b are not applicable". That Specification requires thirty day written reports whenever a plant is operating in a degraded mode permitted by the Tech Specs. The exemption offered here is intended to reduce the number of essentially valueless reports about inoperable instruments and the like. For plants which do not have standard Tech Specs, corresponding exemptions may be developed on a case by case basis.

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Fifth, the requirements of 4.11.1.1 for monitoring liquid effluents for P-32 may be omitted. A recent NRC-sponsored study has shown that the bio-accumulation factor for this relatively short-lived nuclide is substantially less than was previously assumed. Consequently, P-32 cannot be a major contributor to offsite doses.

Sincerely,

Charles A. Willis

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cc: F. Simpson (EG&G)
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