UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON D C 20555

FEB 11 1982

Docket Nos. 50-324/325

MEMORANDUM FOR: T. M. Novak, Assistant Director
for Operating Reactors, DL

FROM: R. W. Houston, Assistant Director
for Radiation Protection, DSI

SUBJECT: REVIEW OF PROPOSED CHANGES TO THE ENVIRONMENTAL TECHNICAL SPECIFICATIONS FOR BRUNSWICK STATION (TAC #47536)

On January 15, 1982, Carolina Power and Light Company (CP&L) requested a change to the Appendix B Environmental Technical Specifications (ETS) in licenses DPR-71 and 62 for the Brunswick Steam Electric Plant, Unit Nos. 1 and 2. Specification 2.5.2.b(1) defines the "calculational method for determining the average release rate of noble gases from the site during any 12 consecutive months". Specification 2.5.2.b(2) contains similar language and pertains to I-131 and radioactive materials in particulate form. In the event an annual limit is exceeded during any 12 consecutive months, the licensee must identify the causes of the release rates, define and initiate a program of action to reduce the release rates to design objective levels and report these actions to the Commission within 30 days from the end of the calendar quarter during which the releases occurred. The proposed change is to replace the "any 12 consecutive months" with "any calendar year".

The model Radiological Effluent Technical Specifications (RETS) for BWR's, NUREG-0473, contain several action statements which require the licensee, in the event a quarterly effluent limit is exceeded, to take action "to reduce the releases ... during the remainder of the calendar quarter and during the subsequent three calendar quarters, so that the cumulative dose" does not exceed the annual limit. The staff met with a number of representatives of nuclear utilities under the auspices of the Atomic Industrial Forum, Inc. on November 10, 1981, to discuss the implementation of the RETS at operating reactors. Comments were made by several representatives to the effect that the above wording created an unnecessarily cumbersome record keeping and reporting requirement and suggested that a calendar year approach would be a more valid interpretation of the annual objectives in 10 CFR 50, Appendix I.

After considering these comments, the staff concluded that the present wording provided little or no increased protection of the public and that the suggested change should be accepted. Consequently, on November 20, 1981, we provided such guidance to our contractors who are responsible for resolving differences between the OR licensee's technical specifications and the model RETS. By memorandum from W. P. Gammill, dated January 25, 1982, similar guidance was provided to the ETSB Staff for their use in implementing the RETS for plants undergoing OL review.

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Although the wording in the Brunswick technical specifications differs from that in the model RETS, the "12 consecutive month" requirement poses the same record keeping problem as did the model RETS. In light of the earlier decision on the model RETS, we consider the proposed technical specification change to be reasonable and consistent with present policy. Thus, we conclude that replacing the phrase "12 consecutive months" with the phrase "calendar year" in Brunswick Specification 2.5.2.b is acceptable.

It should be noted that Brunswick-2 is continuing to encounter problems with higher than normal gaseous effluent releases. These problems were summarized in the Safety Evaluation which accompanied License Amendment No. 37, dated June 3, 1981. This amendment addressed the licensee's schedule for installing new augmented off-gas systems for Brunswick, Unit Nos. 1 and 2. Fission product leakage from the fuel has now increased to the point that the radioactive noble gas release rate is approaching twice the annual limit. The proposed change will provide the licensee some short-term relief since the transition will occur early in the calendar year. However, there will be no long-term relief since the annual release rate limits are unchanged. Refueling, now scheduled for May 1982, is expected to reduce releases to normal levels. However, depending upon fuel performance during the remainder of this cycle and following refueling, additional action may be required this calendar year.

Original Signed by
R. Wayne Houston

R. Wayne Houston, Assistant Director
for Radiation Protection
Division of Systems Integration

cc: R. Mattson
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 13, 1982

MEMORANDUM FOR: File 81-17

FROM: Mark E. Resner, Investigator
Office of Inspector and Auditor

SUBJECT: POSSIBLE WILLFUL VIOLATION OF REPORTING REQUIREMENTS

During a telephone conversation with Carl Alderson, Region II, on January 12, 1982, I requested that he forward a copy of the IE investigative report on this matter. He agreed to do so.

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