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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
MAR 13 1990

Docket No.: 50-416

MEMORANDUM FOR: Lester L. Kintner, Project Manager
Project Directorate II-1
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

FROM: LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

SUBJECT: GRAND GULF NUCLEAR POWER PLANT - TURBINE
LUBRICATING OIL DISPOSAL (TAC NO. 73379)

This memorandum is a follow-up to my January 2, 1990 memorandum to you concerning the disposal of slightly contaminated turbine lubricating oil from the Grand Gulf nuclear power plant by System Energy Resources, Inc. (SERI - licensee). SERI had considered approximately 14,050 gallons of treated oil to be non-radioactive since the oil was determined to have detectable radioactivity below a lower limit of detection (LLD) of 5×10^{-4} $\mu\text{Ci/ml}$ for gamma-emitting radionuclides. The oil was incinerated at a sister fossil fuel plant. The memorandum stated that although other nuclear power plant licensees have obtained permission from the NRC under 10 CFR Part 20.302 for the onsite incineration of waste oil based on an effluent release LLD at the cited level, it appeared that the licensee did not obtain prior approval for this action nor was the oil incinerated onsite.

The point requiring clarification in my earlier memorandum was the LLD (from the Technical Specifications) which would apply to a given situation relative to the disposal of decontaminated oil. There are four possible combinations of LLDs and disposal locations, as follows:

	<u>Disposal Location</u>	<u>LLD to be Used</u>	<u>Licensee Action</u>
1.	Onsite	Effluent	- 10 CFR 20.302 or Tech Spec amendment request (a priori)* - Document in licensee records

*Proposed final rule change to 10 CFR Part 20.305 will authorize onsite incineration of slightly contaminated waste oil.

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	<u>Disposal Location</u>	<u>LLD to be Used</u>	<u>Licensee Action</u>
2.	Onsite	Environmental	- Document in licensee records
3.	Offsite	Effluent	o 10 CFR 20.302 request (a priori) o Document in licensee records
4.	Offsite	Environmental	o Document in licensee records

Note that in Option Nos. 2 and 4, wherein the environmental LLD was used, no prior notification of the NRC or Agreement State would be required on the basis that the material being disposed contains no radioactive materials in concentrations above the most restrictive LLD. From our perspective, the material is not radioactive. In Option Nos. 1 and 3, the material could be radioactive in the sense that concentrations may be present in excess of the most restrictive LLD; thus, a 10 CFR 20.302 application (or possibly a Technical Specification amendment) would be required. Option No. 3 was the one used by Grand Gulf for the disposal in question.

If you have any further questions on this matter, please let me know.

Original signed by Thomas H. Essig
 LeMoine J. Cunningham, Chief
 Radiation Protection Branch
 Division of Radiation Protection
 and Emergency Preparedness
 Office of Nuclear Reactor Regulation

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