

SEP 06 1978

MEMORANDUM FOR: T. Ippolito, Chief  
Operating Reactors Branch No. 3, DOR

FROM: J. T. Collins, Chief  
Effluent Treatment Systems Branch, DSE

SUBJECT: COMMENTS ON LETTER TO CAROLINA POWER & LIGHT COMPANY

In response to your request, I have reviewed the draft letter to Carolina Power & Light Company (CP&L) concerning the AOG system for Brunswick and my comments are noted below. In addition, we have reviewed the model Technical Specification enclosed with the draft letter and our comments are attached.

Your letter requests CP&L to provide a commitment to complete feasibility studies and select a design to modify the AOG system by April 1, 1979, and a commitment to submit a schedule by July 1, 1979, for implementing an operable AOG system at Brunswick. It is my understanding that these dates were agreed to at a meeting with CP&L on July 27, 1978, which I did not attend. I find both of these dates to be unacceptable and, therefore, I do not concur in the proposed letter.

It is my understanding that CP&L is studying the various types of recombiners (thermal vs catalytic) and, based on the findings of this study, will decide which way to go. It is not apparent to me why such a study will require 9 months to complete. In my opinion, this is a delay tactic on the part of CP&L. To my knowledge there are no thermal recombiners presently being used on offgas systems in commercial nuclear power plants. Should CP&L decide to select this type of recombiner, we will require a detail topical report which describes the design, operation, and performance of this recombiner before we would accept such a system for use in Brunswick. Our review of such a system could take anywhere from six months to a year. This could further delay the installation and operation of an AOG system at Brunswick. I would also like to point out that Appendix I to 10 CFR Part 50 specifically states, "radwaste systems shall include all items of reasonably demonstrated technology," not new and unproven systems. I do not consider thermal recombiners for use in BWR offgas systems to satisfy the criteria "reasonably demonstrated technology".

ORIGINAL SIGNED BY

JOHN T. COLLINS

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ETSB Reading File  
ETSB Docket File 50-324/325  
JTCollins

John T. Collins, Chief  
Effluent Treatment Systems Branch  
Division of Site Safety and  
Environmental Analysis

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T. Ippolito

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Enclosure:  
ETSB Comments

cc: R. DeYoung  
R. Vollmer  
G. Knighton  
W. Burke

ETSB COMMENTS ON  
MODEL TECH SPECS FOR BRUNSWICK

- 1) Table 2.5.2-1 needs another group for Unidentified Noble Gases.
- 2) By requiring noble gas nuclides in this list to be measured, aren't you overlooking the impact from nuclides with half-lives less than 8 days (the iodines and particulates) due to operation without the AOG? The computer run indicated that I-133 was major at Brunswick without the AOG, but is not limited by the present license, nor this change.
- 3) Specification 2.5.2.c.(1) should have "and" rather than "or" between the equations.
- 4) Specification 2.5.2.f should have "and" rather than "or" between the equations.
- 5) Specification 2.5.2.h should be required even when the AOG is not operating. Since the temperature is not known (inoperable), the H<sub>2</sub> monitors (both) must be operating and the valves downstream of the recombiner closed if either monitor detects greater than 4% H<sub>2</sub> in the offgas line downstream of the recombiners. We will permit one monitor to be inoperable for a period not to exceed 48 hours, provided grab samples are analyzed every 4 hours, then valve closure shall be required (reactor shutdown).