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Mr. Richard P. Crouse
Vice President, Nuclear
Toledo Edison Company
Edison Plaza - Stop 712
300 Madison Avenue
Toledo, Ohio 43652

Dear Mr. Crouse:

SUBJECT: RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS (RETS),
SUMMARY OF MEETING SEPTEMBER 2 AND 3, 1982

Enclosed for your use is a summary of the meeting held with your staff, the NRC, and our consultant, Franklin Research Center, on September 2 and 3, 1982. This summary, prepared by our consultant, presents the agreed upon resolutions to various issues related to your RETS submittal on March 16, 1979 (No. 488) and the Offsite Dose Calculation Manual (ODCM) submittal on May 18, 1979 (No. 504). Please submit your revised RETS and ODCM no later than November 15, 1982.

Sincerely,

ORIGINAL SIGNED BY
ALBERT W. DE AGAZIO

Albert W. De Agazio, Project Manager
Operating Reactors Branch #4
Division of Licensing

Enclosure:
Mtg. Summary

cc w/enclosure:
See next page

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OFFICE	ORB#4:DL Ade Agazio	C-ORB#4:DL JStolz				
SURNAME						
DATE	9/1/82:cb	9/1/82				

Toledo Edison Company

cc w/enclosure(s):

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 1, 1982

Docket No. 50-346

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Toledo Edison Company
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Sincerely,

A handwritten signature in cursive script, appearing to read "Albert W. De Agazio".

Albert W. De Agazio, Project Manager
Operating Reactors Branch #4
Division of Licensing

Enclosure:
Mtg. Summary

cc w/enclosure:
See next page

SITE TRIP REPORT

To: Davis-Besse Nuclear Power Station
Licensee: Toledo Edison Company

Date of Trip: 9/2-3/82
Project: 504-5506-001
NRC TAC: 8141
FRC Assignment 4
FRC Task 91
Docket No. 50-346

Attendees:

FRC

A. Cassell
S. Y. Chen

NRC

W. Meinke
A. DeAgazio

Toledo Edison

D. Briden
R. Scott
S. Bland
J. S. Wasilk
G. Downing
L. Bonker
K. Clayton
J. Lietzow
R. Peters
L. Young
G. Bradley

The purpose of this site visit to Davis-Besse Nuclear Power Station was to discuss with the Licensee FRC's initial review of the Licensee's submittal of Radiological Effluent Technical Specifications (RETS) and the Offsite Dose Calculation Manual (ODCM).

It was the intention of FRC to identify and resolve the technical differences and missing information that had been encountered during the review of the Licensee's initial submittals to the USNRC, the RETS submittal dated March 8, 1979, and the ODCM submittal dated April 19, 1979, as compared to the Model RETS, NUREG-0472, Revision 2, dated February 1980.

Through the direction of the USNRC representative, W. Meinke (RAB), the reviewers (FRC) were directed to use the latest revision of the Model RETS, NUREG-0472, Revision 3, dated June 4, 1982, as the guideline for comparison.

Summary of Major Issues

The major issues discussed during the site visit are highlighted in the following sections: (1) Liquid Effluent Monitoring Instrumentation, (2) Gaseous Effluent Monitoring Instrumentation, (3) Liquid Concentration, (4) Liquid and Gaseous Tank Limitations, (5) Gaseous Dose Rate, (6) Explosive Gas Monitoring, (7) Liquid and Gaseous Dose Design Objectives, (8) Sampling and Analysis Program, (9) Environmental Monitoring Program, (10) Radwaste Treatment System, (11) Basis for Specifications, (12) Plant Design Features, (13) Administrative Control, and (14) Offsite Dose Calculation Manual.

The Licensee, Toledo Edison, has made a verbal commitment to send a revised draft copy of the RETS and ODCM to the Commission (USNRC) no later than November 15, 1982.

1. Liquid Effluent Monitoring Instrumentation (Section 3.3.3.9 of Model RETS):

- o The Licensee stated they do not have a steam generator blowdown; therefore, this would not be applicable.
- o The Licensee will give justification for not including service water system monitoring.
- o The turbine building sump effluent line is not monitored. The Licensee will give the approximate date of installation of the system and will include specifications to cover the monitoring system.
- o The Licensee will address, in the resubmittal cover letter, the surveillance requirements for the turbine building sump effluent line.
- o Table notations under Table 4.3-12 (Model RETS) and Table 4.3-15 (Licensee submittal) do not contain monitoring features which cover circuit failure and downscale failure. The Licensee will justify the absence of these two conditions in the resubmittal cover letter.
- o Assuming the Licensee will address the above items in their resubmittal, there are no open items in the section.

2. Gaseous Effluent Monitoring Instrumentation (Section 3.3.3.10):

- o Iodine and particulate samplers are not required for the waste gas holdup system because this is part of the station vent stack effluent release and is detected at that point.
- o The Licensee will add to the title in Table 3.3.16 (Gaseous Effluent Monitoring Instrumentation, Waste Gas Decay System) the words "Providing Automatic Isolation".
- o The condenser evacuation system, containment purge system, auxiliary building vent system, fuel storage area vent system, and radwaste area vent system are all released through the station vent stack and are not classified as effluent release points. Process monitors may be warranted but effluent release monitors may not.
- o For the channel functional test in Table 4.3-16, Surveillance for gaseous effluent monitors of instrumentation, table notation (3), the Licensee will give justification for not including circuit failure, downscale failure, and nonoperable mode.

- o Condenser evacuation system is covered by the vacuum discharge system with process monitors RE-1003.
 - o Assuming the Licensee will address the above items, there are no open items in this section.
3. Liquid Effluent Concentration (Section 3.11.1.1):
- o The Licensee will change LCO in the resubmittal to be equivalent to the Model RETS, Revision 3 as well as Surveillance Requirements.
 - o No open items in this section.
4. Liquid and Gaseous Tank Limitations (Sections 3.11.1.4 and 3.11.2.6):
- o The Licensee will justify not addressing liquid outdoor storage tanks and will include temporary tanks in this specification.
 - o The Licensee wishes to eliminate gas storage tanks specification, with written justification in the resubmittal cover letter. They desire to place this in the ODCM, in order that any change will not require a specification change (open item). The Licensee addressed this section in the original submittal.
 - o One open item in this section.
5. Gaseous Dose Rate (Section 3.11.2.1):
- o The Licensee will change their specification to reflect equivalence to Model RETS, Revision 3.
 - o No open items in this section.
6. Explosive Gas Monitoring (Section 3.11.1.5B):
- o The Licensee will change their specification to read "without delay" or will justify the time limit to be, as is, in their RETS submittal. Two channels are operable (Accepted on Interim Basis).
 - o No open items in this section.
7. Liquid and Gaseous Dose Design Objectives (Sections 3.11.1.2, 3.11.2.2, and 3.11.2.3):
- o The liquid effluent dose specification will be changed to reflect Action Item per Model RETS, Revision 3.
 - o The calendar year value for liquid effluent dose will be added or justification given for not including.
 - o The Licensee will add or justify not including dose values for release during the calendar year for noble gases.

- o The Licensee will add or justify not including dose value for release during calendar year for iodine-131, tritium, and radionuclides particulate form with $T_{1/2} > 8$ days.

- o No open items in these sections.

8. Sampling and Analysis Program (Section Tables 4.11.1 and 4.11.2):

- o The Licensee will address deviation in LLD for both tables, where the elapse time constant, ΔT , is not included in either table notation for sampling and analysis of liquid and gaseous waste.
- o Under the table notation, the Licensee will give justification for including additional paragraphs under notation (6) in Table 4.11.1.
- o The Licensee states there are no continuous liquid releases; therefore, sampling is not required.
- o The Licensee will not include table notation (d) in Table 4.11.2 for gaseous waste sampling. Referral is to table notation (g) in Revision 3. They will justify the deletion in their resubmittal cover letter since the Licensee questions the intent of the statements (open item).
- o The Licensee will address surveillance according to Model RETS, Revision 3, or give justification for not using it.
- o The Licensee will delete "edible meat" from Table 3.12.1.
- o One open item in this section.

10. Radwaste Treatment System (Sections 3.11.1.3 and 3.11.2.4):

- o The Licensee will justify their position on liquid waste treatment by providing a cost-benefit analysis.
- o The Licensee states the gaseous radwaste treatment system operates all the time and a specification should not be required for this section. They will present a cost-benefit analysis for the system. They will take one of three options: (1) use the values in Model RETS, Revision 3, (2) provide a cost-benefit analysis to justify their submitted values, or (3) delete the complete specification and justify in their resubmittal.
- o No open items in this section.

11. Bases for All Major Specifications:

- o The Licensee will include in the resubmittal the bases for all major specifications not addressed.
- o No open items in this section.

12. Plant Design Features (Section 5.0):

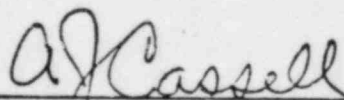
- o The Licensee will resubmit updated site drawings, reflecting the requirements of the Model RETS, Revision 3.
- o No open items in this section.

13. Administrative Controls (Section 6.0):

- o Under Section 6.9.1.12, Prompt Notification, part (j) of Model RETS, the Licensee will delete until resolved by NRC. Model RETS, Revision 3, deletes the requirement of notification to the Commission (open item).
- o The Licensee wishes to include in the 30-day written report (Section 6.9.1.13), in addition to "unplanned" offsite releases, two other conditions, "uncontrolled" and "accidental".
- o One open item in this section.

14. Offsite Dose Calculation Manual:

- o The sections of the ODCM reviewed are: (1) liquid and gaseous monitoring set-point determinations, (2) liquid effluent concentration, (3) liquid and gaseous effluent dose calculations, (4) gaseous dose-rate calculations, (5) projected doses for liquid and gaseous radwaste treatment system methodology, (6) sample location tables for liquid and gaseous effluents, and (7) release pathway diagrams for liquid and gaseous discharge.
- o Without exception, the Licensee gave acceptable justification or referred to a more complete, updated ODCM for all questions posed in the ODCM technical review report and discussed at the Licensee's site. The ODCM resubmittal will include changes recommended by the reviewer plus information missing in the original submittal. The Licensee has already updated the environmental monitoring sample locations in order to satisfy the latest NRC Branch position.
- o No open items in the ODCM review.



A. J. Cassell
Sr. Staff Scientist

Date Submitted:

September 27, 1982