

Collins

JUN 15 1979

MEMORANDUM FOR Edward S. Christenburg, Hearing Division Director and Chief Counsel

FROM: William E. Kregar, Assistant Director for Site Analysis, DSE

SUBJECT: REVIEW OF LETTERS TO LICENSEES PERTAINING TO RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

Enclosed are two letters intended to be sent to licensees of operating plants. One of the letters is concerned with delayed Appendix I Technical Specification submittals, and the other is concerned with the implementation of 40 CFR Part 190, where Radiological Effluent Technical Specifications will not be issued to the licensee by December 1, 1979.

We request that you review these letters and provide your comments to us. Since it is important that these letters be sent to the licensees as soon as possible, we request that we receive your comments by June 21, 1979.

Original signed by

William E. Kregar, Assistant Director for Site Analysis, Division of Site Safety and Environmental Analysis

Enclosures: As stated

cc: 2-0 enclosure  
R. DeYoung  
D. Muller  
J. Collins  
R. Bangart  
B. Knighton  
d. Scinto  
M. Burke

DISTRIBUTION:  
Central File  
NRR Reading File (P-428)  
ETSB Reading File  
ETSB Subject File 5.4  
WEKregar

OFFICE	DSE:SA:ETSB	DSE:SA:ETSB	DSE:SA		
SURNAME	WCBurke:dia	JTCollins	WEKregar		
DATE	06/14/79	06/14/79	06/14/79		

DRAFT  
06/12

MEMORANDUM FOR: D. G. Eisenhut, Acting Director, DOR  
FROM: D. R. Muller, Acting Director, DSE  
SUBJECT: DELAYED APPENDIX I TECHNICAL SPECIFICATION SUBMITTALS

A number of utilities have not responded to our request for submittal of Draft Radiological Effluent Technical Specifications, nor have they indicated when they will provide us with their submittals. Since the implementation date for 40 CFR Part 190 is December 1, 1979, we need to have Radiological Effluent Technical Specifications implemented by that date or as soon thereafter as we can. In addition, we need to have the submittals in hand in order to schedule the review effort with the limited personnel available at this time.

Toward this end, enclosed with this memo is a suggested letter that we propose should be sent to the list of licensees attached to the letter.

## TO REACTOR LICENSEES

Gentlemen:

In a letter from B. Grimes, Assistant Director for Engineering and Projects, dated November 15, 1978, you were provided additional guidance for the preparation of your proposed effluent Technical Specifications and a revised submittal schedule. In addition, this letter provided a schedule for one-day seminars on the Draft Radiological Effluent Technical Specifications conducted at each of four Regional Offices in November and December 1978, to provide further guidance and to answer questions concerning the specifications. To date, you have not submitted your Draft Radiological Effluent Technical Specifications in response to our request, nor have we received any requests for additional guidance for the preparation of the Technical Specifications, Offsite Dose Calculation Manual, or Process Control Program.

The Radiological Effluent Technical Specifications must address 40 CFR Part 190, Uranium Fuel Cycle Standard, as well as the appropriate sections and appendices of 10 CFR Part 50. The implementation date for 40 CFR Part 190 is December 1, 1979. Our efforts in the implementation of these Technical Specifications have been in keeping with meeting this implementation date.

We request, therefore, that you submit Radiological Effluent Technical Specifications in accordance with the guidance provided to you in our letter of November 15, 1978, within 30 days. If you cannot meet this schedule, provide a schedule for our review by which you can make your submittal.

Sincerely,

Brian K. Grimes, Assistant Director  
for Engineering and Projects

Enclosure: List of Plants to Receive

LIST OF PLANTS TO RECEIVE LETTER

LaCrosse

Salem 1 & 2

Big Rock Point

Browns Ferry 1-3

Duane Arnold

Three Mile Island

Humboldt Bay

Rancho Seco

Indian Point 1 & 2

Point Beach 1.&.2

MEMORANDUM FOR: D. G. Eisenhut, Acting Director, DOR  
FROM: D. R. Muller, Acting Director, DSE  
SUBJECT: IMPLEMENTATION OF 40 CFR PART 190 BY PLANTS WITHOUT RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

The implementation date for the EPA Uranium Fuel Cycle Standard, 40 CFR Part 190 for light-water reactors is December 1, 1979. The Radiological Effluent Technical Specifications, NUREG-0472 (Rev. 3) and NUREG-0473 (Rev. 3) implement the light-water reactor provisions of 40 CFR Part 190. However, due to the licensee delays in providing Technical Specification submittals, not all licensed plants will have the Technical Specifications issued to them on the December 1, 1979 date.

In order to remind these licensees of their responsibility for conforming to the EPA standard, we believe a letter should be issued to them stating this responsibility. Enclosed is a copy of a suggested letter (Enclosure 1) that should be sent to each of the licensees listed in Enclosure 2.

Enclosures:

1. Suggested Reminder Letter
2. List of Plants to Receive letter

cc: R. DeYoung  
W. Kreger  
J. Collins  
G. Knighton  
B. Grimes  
F. Congel  
W. Burke

DRAFT  
06/12  
Enclosure 1

Gentlemen:

The effective date for implementation of the EPA Uranium Fuel Cycle standard, 40 CFR Part 190 for light-water reactors (LWR), is December 1, 1979. The Radiological Effluent Technical Specifications, NUREG-0472 (Rev. 3) for PWRs and NUREG-0473 (Rev. 3) for BWRs implement the LWR provisions of 40 CFR Part 190. Since your submittal of these Technical Specifications was not received as scheduled in the letter to you from B. Grimes, Assistant Director for Engineering and Projects, dated November 15, 1978, the Radiological Effluent Technical Specifications will not be in effect for your facility on December 1, 1979.

The lack of Technical Specifications which implement the provisions of 40 CFR Part 190 does not relieve you of the responsibility to conform to the EPA standard. Therefore, you should determine how you will show conformance with the provisions of 40 CFR Part 190 until such time as you are issued the revised Radiological Effluent Technical Specifications. You should provide a submittal of the method you will use to NRC no later than November 1, 1979.

If you have any questions, please contact us.

Sincerely,