

September 1, 1979

NOTE TO: J. T. Collins, Deputy Director
TMI-2 Support

FROM: L. Bell
TMI-2 Support

SUBJECT: AN IN-HOUSE REVIEW OF THE EIA IN ANTICIPATION
OF POTENTIAL QUESTIONS

During the week of 8/27/79, I had an opportunity to review the final version of the EIA that is currently out for comment. As I read through this document, I found that there are a number of areas where either a decision has to be made or there exists the possibility for questions to arise that will have to be addressed after the comment period. I decided to list my comments for your review.

- i. Page 4, first paragraph
What are the bases for the occupational exposures listed?
- ii. Page 5, first paragraph
This statement needs to be fixed. We do not give credit in our evaluations to an unlined building in the event of a tank or line failure, therefore, this statement is not true.
- iii. Page 6, section 3.3, second sentence
This statement is not consistent with the current position of complete isolation of Unit 1 and 2.
- iv. Page 6, section 3.3, first sentence of second paragraph
This statement infers that disposal to the environment is expected prior to the second phase of evaluation.
- v. Page 7, second sentence of first paragraph
This statement is not true. EPICOR-2 can receive water from the tank farm. In fact, no where in the EIA is it referenced that the tank farm could be a source of input to EPICOR-2.
- vi. Page 8, first paragraph, fifth sentence
See comment iii above.
- vii. Page 10, Section 3.4.2
See comment ii above.

- viii. Page 11, first full paragraph after #9, last sentence
See comments iii and iv above.
- ix. Page 11, last paragraph, second sentence
This statement may not be true. It may depend on the volume and activity in the Off-Spec Waste Receiving Tank.

In addition to the questions from the EIA listed above from an operational standpoint, I have some concerns that should be discussed. Following is a list of items that we need to discuss in-house to access if a problem does in fact exist.

1. Where will processed water be put.
2. The need for placing administrative limits on the volume of water allowed in the Off-Spec Receiving Tank.
3. The possible need for an isolation valve upstream of ALC-V-086 for maintenance purposes.
4. The need for emergency lighting for ALC-V-086 and ALC-V-043.
5. How important is it from an exposure point of view to have people go into the Chemical Cleaning Building and close ALC-V-043 and ALC-V-086.
6. Is there a need to install a dip pan under ALC-V-086 to collect and route leakage to the sump.

I have discussed the above questions with the staff and, as a result of these discussions, my concerns still exist.

Reasons For Concerns

1. Disposition of Processed Water

The current position of complete isolation of Unit 1 and Unit 2 has eliminated the alternative of sending processed water to Unit 1. The system as designed, has only one other discharge point. This discharge is to a truck fill station.

The two methods proposed for disposal of processed water are: (1) construction of storage tanks, and (2) recycling back to Unit 2 for flushing. The first is a long lead time item; the second is not possible unless the water is routed through U-1. Processing and storage in the CCB has two shortcomings, i.e., cross contamination and insufficient storage capacity for the 280,000 gallon in the Auxiliary Building, plus the water currently being stored in the bank farm.

2. Need to place administrative limits on the volume of water routed to the Off-Spec Waste Receiving Tank.

I have two concerns here. Once, there is only one isolation valve on this tank (see discussion below) ALC-V-005 cannot be considered as an isolation valve. Second, in the event that this tank overflows and the sump is full, there is no place for the water to go, but on the CCB floor. If there is an accident or equipment failure, water ends up on the CCB floor and there is no way to remove the water.

3. Need For An Isolation Valve Upstream of ALC-V-0086

From a maintenance standpoint, the design in use is unacceptable. In the event of problems with ALC-V-086, there is no way of isolating the Off-Spec Tank. If water is in the Off-Spec Tank, this water would have to be removed prior to valve maintenance. This will take time. If ALC-V-086 starts to leak, contaminated water will end up on the floor causing possible airborne problems and creating a decon mess. The leak would be under the tank creating a mess all over the floor.

4. Need For Emergency Lighting In The Area Of ALC-V-043 and ALC-V-005

In the event of a loss of power, people will have to be sent into the CCB to close these valves. Without lighting there, there is no way that these people will be able to see what they are doing in the valve area of the building.

5. Sending People In To Close ALC-V-043 and ALC-V-086

See comment above. We need to discuss requiring that ALC-V-043 and ALC-V-086 be of the type that fail shut.

6. Drip Pan For ALC-V-086

See comment 3 above.

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