


Offshore Power Systems

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September 17, 1982

 Ms. Elinor Adensam, Chief
 Licensing Branch No. 4
 U.S. Nuclear Regulatory Commission
 7920 Norfolk Avenue
 Bethesda, MD 20852

 Reference: Docket No. STN 50-437 Manufacturing
 License - Environmental Protection
 Plan

Dear Ms. Adensam:

This will confirm a September 15, 1982 telephone conversation between D. H. Walker and D. C. Aabye of my Staff and Ron Ballard of the Environmental Engineering Branch. Attached are the changes to the subject document (as it was originally drafted by the NRC) which were agreed to by telephone. These changes were telecopied to Ron Ballard on September 16, 1982. It is noted that the first paragraph of Section 3.1 of the Environmental Protection Plan, as proposed by Offshore Power Systems, is consistent with paragraph D(2) of the draft license which in turn is consistent with the Final Environmental Statement (Part I). Both paragraphs D(2) and D(3) of the draft license are repeated in substance in the Environmental Protection Plan.

Very truly yours,

 P. B. Haga, Manager
 Engineering

COO1

/lel

 CC: V. W. Campbell
 R. A. Thomas
 R. L. Ballard (NRC-EEB)
 B. Z. Cowan, Eckerd, Seamans, Cherin and Mellott

Attachment

TO: Ron Ballard (Ext. 24818)
Air Rights Bldg.

FROM: Walker/Aabye (OPS)

1. Change the introductory paragraph to Section 1.0 to read:

The purpose of the Environmental Protection Plan (EPP) is to provide for protection of environmental values during operation of the manufacturing facility. The principal objectives of the EPP are as follows:

2. Change Section 1.0, sub (3) to read:

Keep NRC informed of the environmental effects of FNP design changes and manufacturing facility operation and of actions taken to control these effects.

3. Revise Section 3.1 to read as follows:

3.1 Plant Design and Manufacturing Activities

Before making an FNP design change or before engaging in a Manufacturing activity/¹, either of which is determined by the licensee to involve an unreviewed environmental question, the licensee shall provide written notification to (*) the NRC.

An FNP design change or a manufacturing activity shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which is likely to result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents (in accordance with 10 CFR Part 51.5(b) (2)); or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in FNP design and manufacturing activities carried out pursuant to this Subsection. These records shall include a written evaluation which provides bases for the determination that the change does not involve an unreviewed environmental question.

Activities governed by Section 3.3 of this EPP are not subject to the requirements of this section.

4. Revise the present footnote on p. 3-1 to read:

¹ Manufacturing Activity means an operation conducted at the Manufacturing Facility (1) for the purpose of FNP fabrication or testing or (2) for the purpose of controlling the environmental impact of FNP fabrication or testing.

* This is the wording proposed by Offshore Power Systems. If prior notification is determined to be a requirement, the words "Provide written notification to" should be replaced by the words "obtain prior approval from".

5. Revise Section 3.3 to read:

Changes which would otherwise be within the scope of Subsection 3.1, but which are required to achieve compliance with

6. Revise Section 4.1 (first two paragraphs) to read:

Any occurrence of a significant event that indicates or could result in significant environmental impact causally related to manufacturing activities shall be recorded and promptly reported to the NRC within 24 hours followed by a written report within 30 days. No routine monitoring programs are required to implement this condition.

The written report shall (a) describe, analyze, and evaluate the event, including the extent and magnitude of the impact, (b) describe the manufacturing facility conditions at the time of the event, (c) describe the probable cause of the event, (d) indicate the action taken to correct the reported event, (e) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (f) indicate other agencies notified and their preliminary responses.