



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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J. Collins
File
EBB Tech Specs

NOTE TO: W.E. Kreger, Assistant Director
for Site Analysis, DSE

FROM: R. L. Bangart, Acting Chief
Effluent Treatment Systems Branch, DSE

SUBJECT: NRC ESTABLISHMENT OF EMISSION LIMITS TO
IMPLEMENT THE CLEAN AIR ACT (CAA)

We continue to favor the approach of using 40 CFR 190 and 10 CFR 50 Appendix I to satisfy the requirements of the CAA and recommend that the possibility of using this method continue to be vigorously pursued. If this approach is determined to be an unsatisfactory method of implementing the CAA, then a considerable amount of staff resources will be required to develop and implement emission limits.

An approach which, if successful, would likely minimize the impact on the staff is suggested below.

The emission limits promulgated by NRC should be generic to eliminate the large amount of work involved in developing limits for each plant or site. These generic limits should be developed using conservative meteorology and decontamination factors which are easily achieved by present treatment systems. On this basis, it may be possible to develop a generic PWR and BWR airborne emission limit table which incorporates the best available technology, easily satisfies 10 CFR 50 Appendix I, and is compatible with 40 CFR 190 (since liquid pathway can be shown to have negligible dose contribution). The intent would be to establish emission limits which would result in doses which are above our estimates based on realistic equipment performance and below the Appendix I design objectives. Furthermore, analyses based on data in semi-annual effluent reports and our source terms and dose calculations could show that only a few radionuclides, such as I-131 and certain noble gases, are important dose contributors. Therefore, the generic emission limit table could be limited to a handful of radionuclides. We also recommend that the emission limits be developed in the form of Ci/yr to maintain operating flexibility. Provisions of the RETS, such as instantaneous releases not to exceed Part 20, establish appropriate limits for the short periods of release. To determine if this approach is feasible in actuality, a commitment of staff to perform the generic assessment would have to be made.

The more difficult question, of course, is the seeming development of somewhat duplicative criteria which are incompatible. From both the NRC and EPA agency standpoint and the standpoint of effective and meaningful

Federal Government, efforts to eliminate the incompatibility should be undertaken if specific emission limits are developed. Such actions may be necessary as the modification of Appendix I to demonstrate that meeting the emission limits required by the CAA is ALARA. Resources needed for this type of undertaking and the revisions to all technical specifications would be substantial in amount.

For the reasons described, the most rational and effective method to satisfy the CAA is the use of 40 CFR 190 and 10 CFR 50 Appendix I to demonstrate conformance.

Dick

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