

## NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK300 ERIE BOULEVARD, WEST  
SYRACUSE, N. Y. 13202

September 21, 1984

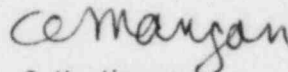
Dr. Thomas E. Murley  
Regional Administrator  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Re: Docket No. 50-220

Dear Dr. Murley:

In accordance with Nine Mile Point Nuclear Station Unit 1 Technical Specifications, we hereby submit the following 30-day Nonroutine Environmental Operating Report. This report is submitted in accordance with the required content of section 4.6.2 of the Appendix B Technical Specifications.

Very truly yours,



C.V. Mangan  
Vice President  
Nuclear Engineering & Licensing

CVM/HJF/lo  
Enclosure  
cc: Director, Office of NRR (1 copy)

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## NONROUTINE ENVIRONMENTAL OPERATING REPORT

Nine Mile Point Nuclear Station Unit 1

Docket No. 50-220

September 21, 1984

### Introduction

This Nonroutine Environmental Operating Report is submitted in accordance with Section 4.6.2.a of the Nine Mile Point Nuclear Station Unit 1 Technical Specifications, Appendix B (Environmental Technical Specifications). Section 4.6.2.a indicates that a report shall be submitted in the event that Section 2, "Limiting Conditions for Operations" or a report level or specification is reached (as specified in Section 3, "Environmental Surveillance").

### Description

Appendix B, Table 3.2-1, requires that a sensitivity (or LLD value) of 80 pCi/Kg - dry or less be attained for the radiological analysis of environmental fish samples. This sensitivity specification applies to gamma spectral analysis, Sr-89 analysis and Sr-90 analysis.

Fish samples collected during June 1984 showed several radionuclides with a sensitivity (or LLD value) of greater than 80 pCi/Kg - dry when analyzed by gamma spectral analysis. Sensitivities for Sr-89 and Sr-90 analyses were less than the required sensitivity for the June 1984 samples.

These inconsistencies were noted as a result of receipt and review of fish sample data on August 23, 1984.

### Cause

The required sensitivity was not able to be met for several of the radionuclides for the gamma spectral analyses because of the relatively short half-lives of the radionuclides in question. In addition, the required sensitivity is very low and is well below sensitivities required by Regulatory Guide 4.8 (Environmental Technical Specifications for Nuclear Power Plants) or NUREG-0473 (Standard Radiological Effluent Technical Specifications for Boiling Water Reactors).

### Corrective Actions

Several corrective actions were taken by the licensee and an additional action is presently being pursued. These actions include:

- (1) The required fish samples are analyzed using a large sample quantity and are counted for long periods of time in an attempt to achieve low sensitivities.
- (2) The licensee is presently working with the Commission to finalize the Radiological Effluent Technical Specifications (RETS) based on NUREG-0473. These specifications would effectively replace the present Environmental Technical Specifications (ETS). Implementation of the RETS will provide an attainable fish analysis sensitivity based on the more recent Branch Technical Position to Regulatory Guide 4.8 (1979) and NUREG-0473. The Radiological Effluent Technical Specifications (RETS) will be in effect January 1, 1985.