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Environmental Projects Personnel

ADDP PROJECT INSTRUCTION #26-B #26B

GENERIC COMMENT RE RADIOACTIVE RELEASES TO WATER FOR ACCIDENTS
THROUGH CLASS 3

Reference is made to generic comment #2 (pages 10-11 of the "Compilation of Generic Comments"). This comment states that we should describe the environmental effects from accidental releases (through Class 3) of radioactive materials to water.

This Interior comment was handled in the Farm' FES, and similarly in several other FES, as follows:

- A. "The doses calculated as consequences of the postulated accidents are based on airborne transport of radioactive materials resulting in both a direct and an inhalation dose. Our evaluation of the accident doses assumes that the applicant's environmental monitoring program and appropriate additional monitoring (which could be initiated subsequent to an incident detected by in-plant monitoring) would detect the presence of radioactivity in the environment in a timely manner such that remedial action could be taken if necessary to limit exposure from other potential pathways to man. The small quantities of dispersed radioactive material which might enter the food chain would not be significant in terms of endangering aquatic life."

The Fort Calhoun FES contained the following additional paragraph:

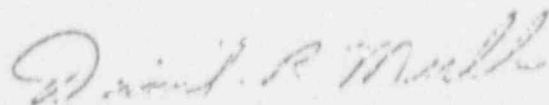
- B. "Radioactive liquid wastes in the Fort Calhoun Station are contained within Class I structures. Failure of equipment within these structures would not lead to a release of radioactive liquid to the environment. The quantity of low-level liquid radioactive materials outside Class I structures is very small and release of this material would not affect substantially the environmental impact determined for routine operation of the plant."

Until further notice, paragraph A above should be used as standard language for DES. Paragraph B should also be included in DES, if appropriate, but "Class I structures" should be changed to read

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"Category 1 structures". Paragraph B is appropriate only for pressurized water reactors and may not be correct for all such reactors since applicants are not "required" to provide Category 1 structures for radioactive liquid wastes. In each case, the Environmental Project Manager should establish through the Safety Project Manager whether liquid wastes are contained within Category 1 structures.



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