

11/6/75

Jay Cunningham, Safety and Environmental Programs Branch, HQ

REGION I COMMENTS ON PROPOSED ENVIRONMENTAL TECHNICAL  
SPECIFICATIONS (JULY 31, 1975) FOR OYSTER CREEK NUCLEAR  
GENERATING STATION  
DOCKET NO. 50-219

Based on your request and on your discussions with Mr. Bores,  
comments on the proposed Environmental Technical Specifications  
for Oyster Creek, as transmitted to you by telephone on October 16,  
1975, are attached.

J. P. Stohr  
Section Leader  
Environmental & Special Projects

Enclosure:  
Region I Comments

cc: F. Dreher

*JPS*  
Stohr  
11/6/75

*Nelson*  
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Transmitted via facsimile on 11/6/75.

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REGION I COMMENTS ON PROPOSED ENVIRONMENTAL TECHNICAL SPECIFICATIONS  
(JULY 31, 1975) FOR OYSTER CREEK NUCLEAR GENERATING STATION.  
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1. Environmental Technical Specifications at OC should be implemented ASAP!! They should not be tied to obtaining Full Term Operating License as suggested by licensee! (OC anticipates a retubing outage in December, 1975 and hence, possible fish kill.)
2. Use of biocides, pH of effluents and chemical usage were not addressed at all in ETS.
3. Sensitivities of radiological analyses were not addressed.
4. Other specific comments are addressed below:

p. 2-1 Spec. 2.1.1 - Use of third dilution pump - Intent of specification is not clearly defined. If the intent is to keep discharge temperatures at a minimum, then why not have all three pumps operate continuously?

Monitoring Requirements - Accurate to  $\pm 3^{\circ}\text{F}$ ? Typical accuracies of these systems are within  $\pm 0.5^{\circ}\text{F}$ .  
How about provision for redundant read-out?

p. 3-1 Spec. 3.1.1.A - As worded, there are no requirements involved, therefore no need for this spec.

Spec. 3.1.1.B - Temperature will be recorded at each station at time of sampling. (Clarification)

p. 3-2 Spec. 3.1.2.A(1) - Define parametric and non-parametric statistics as used in the spec. - also length of study should not be limited in terms of one year or possibly two, but by good statistical evaluation and plant operations and modifications.

p. 3-2 Reporting Requirements - Little conclusive results can be expected after four months of study - suggest semiannual or annual reports. Particularly true of comparisons of impingement with bay catches and commercial and sport catch statistics.

p. 3-5 Reporting Requirements - See previous comments, p. 3-2.

p. 3-6 Reporting Requirements - See previous comments, p. 3-2.

p. 3-7 Specification - Thermal plume Section 4.2, not 4.3.

Bores

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- p. 3-8 Reporting Requirements - see previous comments, p. 3-2.
- p. 3-9 Impingement sampling frequency - 4 mo. study may not be indicative of impingement rates throughout year - typically cyclic (annual) increases are seen.
- p. 3-9 (bottom) Record also dilution pump operation.
- p. 3-12 Reporting Requirements - Again little conclusive information seen after 4 months; also should be prompt reports if unusual impingement events occur; also daily impingement monitoring should be required during periods of high impingement.
- p. 3-13 Dilution pump operation should be one of parameters recorded.
- p. 3-14 Minimum Sensitivity of Analyses? None are specified, not even for milk I-131.

Table 3-1:

Air sampling freq. - weekly instead of biweekly.

Precipitation, well water - add H-3 and gamma spec., also Sr-89, -90 for well water.

Soil - value of analyzing sand?

Vegetation - grassy vegetation (not evergreen branches).

Milk - add gamma spec., Sr-89, 90. Define pasture season!!

Surface water (in Discharge Canal) - monthly composite of weekly (minimum frequency) samples.

- p. 3-18 Figure 3-5 How about indicator air sampling location in residential area along Oyster Creek?
- p. 3-20 Figure 3-7 Indicator grass sampling locations are quite distant from plant.
- p. 3-21 Figure 3-8 Water, sediment, clams, etc. monitored in Forked River (intake)? In Discharge Canal? Water in Oyster Creek (before Discharge Canal); water, sediment in Forked River (before Intake Canal)?

- p. 3-22 80% data recovery to meet objective - may cause utility to be less than fully responsive to obtain all specified samples, especially in latter portion of year. Further 80% recovery over 12 months could allow deletion of one TLD station for an entire year, similar one air sampling station for most of the year, etc. Data recovery should be based on trying to obtain all samples with reasonable effort and justifying those missed. No specific sample should be missed twice in a row.
- p. 4-1 End of wood borer study in June, 1976? No requirements nor review of implemented program - since this is a problem area, long-term monitoring is desirable.
- p. 4-8, Thermal plume measurements to be correlated with circulating water and dilution water flows.  
4-9
- p. 4-9 Fish Kill - advance notification of NRC of eminent fish kill event, and/or prompt notification of fish kill in progress.  
Define "any fish kill"; one fish?, hundreds?
- p. 5-1 ETS 5.1 - radiological environmental monitoring responsibility to V.P., Generation?  
Audits (rad.) should be contained in Appendix B, ETS.  
  
Section 5.5 - GOOD!
- p. 5-6 Section 5.7.1 - 80% data recovery - not desirable, see comments for p. 3-22.

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Radiation Specialist

cc: J.P. Stohr