

May 9, 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
GPU NUCLEAR CORPORATION)	Docket No. 50-320-OLA
)	(Disposal of Accident-
(Three Mile Island Nuclear)	Generated Water)
Station, Unit 2))	

LICENSEE'S STATEMENT OF MATERIAL
FACTS AS TO WHICH THERE IS NO
GENUINE ISSUE TO BE HEARD
(CONTENTIONS 4b IN PART, 4c AND 4d)

Pursuant to 10 C.F.R. § 2.749(a), Licensee states, in support of its Motion for Summary Disposition of Contentions 4b in part, 4c and 4d, that there is no genuine issue to be heard with respect to the following material facts:

1. The AGW disposal system proposed includes a dual closed-cycle evaporator system and an electric-powered vaporizer designed to raise the evaporator distillate temperature and to release the resultant steam to the atmosphere via a flash tank and exhaust stack.
2. The main evaporator is a vapor recompression type unit with the designed flexibility to be configured as a spraying film or climbing film evaporator.

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3. Prior to processing in the disposal system, the AGW will be and/or will have been pretreated by other systems to whatever extent is necessary to be at or below the levels of radionuclide concentrations identified as influent criteria for the evaporator disposal system.

4. The carry-over fraction for this disposal system is expected to be 0.1% or less (a decontamination factor of at least 1,000), based upon routine performance experience with typical and similar evaporator systems.

5. Conductivity monitors will be provided at the main evaporator feed, the evaporator effluent (distillate) and the vaporizer influent.

6. Five sample point stations will be provided for the extraction of process fluids for radiochemical analysis.

7. The vaporizer section of the system, which releases the vaporized distillate into the atmosphere, will be monitored and controlled by a gamma radiation detector, with pre-determined set points based on insuring the TMI-2 Technical Specification instantaneous release limit will not be exceeded.

8. Measurement of Cs-137 by the in-line radiation detector provides a bounding determination of compliance with Technical Specification limits. Therefore, it is not necessary to measure tritium and strontium at the release.

9. Tritium and the beta-emitting isotopes will be determined by sampling and radioanalytical methods.

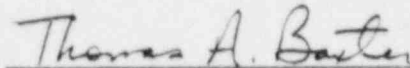
10. The in-line radiation detector will sound an audible alarm and terminate atmospheric release if its setpoint is reached.

11. The instrumentation and safety systems, along with the process control plan, will assure that radiological releases do not exceed those estimated by the NRC Staff in PEIS Supp. No. 2.

12. The disposal system is designed to operate at an evaporator feed rate of 5 gallons per minute, and by design that feed rate cannot be exceeded.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



Thomas A. Baxter, P.C.

Counsel for Licensee

2300 N Street, N.W.
Washington, D.C. 20037
(202) 663-8000

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