

MAY 21 1986

The Honorable Delbert L. Latta
United States House of Representatives
Washington, D.C. 20515

50-346

Dear Congressman Latta:

Your letter of April 15, 1986, to the Nuclear Regulatory Commission has been referred to me to address the concerns of Ms. Marjorie J. Lacy regarding the proposal to bury potentially radioactively contaminated wastes at the Davis-Besse Nuclear Power Plant site. However, before I address those concerns, I want to inform you that, in response to a Commission order, a notice was published in the Federal Register on March 14, 1986, which offered an opportunity for interested parties to participate in an informal hearing to be held on this matter. The period for submitting a petition to participate in the hearing expired on April 14, 1986.

The material proposed for disposal consists of approximately 34,000 cubic feet every five years of very low-level radioactive sludge. The material would be deposited in shallow trenches and covered with topsoil. There are several pathways for exposure to the material that can be postulated. These include standing over the disposal area, eating food grown on the disposal area, inhalation of wind-borne dried sludge, and drinking ground water. Because the disposal site is on land owned by Toledo Edison Company, the first two paths are unlikely and the method of disposal virtually eliminates the third path. The total body dose for the remaining path, drinking ground water, is estimated to be less than 0.1 millirem per year. The U.S. EPA has issued standards for the exposure of individuals to radioactivity from the nuclear fuel cycle. These standards specify that no member of the public receive an annual dose in excess of 25 millirem from planned discharges from nuclear fuel cycle operations. This dose would be only 0.4% of that exposure. When compared to the U.S. EPA drinking water standards applicable to community water supplies, the dose is 2.5% of the 4 millirem standard. This low level of exposure does not represent a threat to public health and safety nor will it damage aquatic and wildlife in the vicinity.

Ms. Lacy expresses concern that the burial of the dredgings on the Davis-Besse site could result in release of radioactivity into Lake Erie as a result of flooding of the burial location. It should be noted that the material presently is in open settling ponds. Removal and burial of the dredgings would reduce the already low likelihood of this material reaching the lake.

To understand why this waste material is acceptable for on-site burial, it is important to understand the source of the wastes. The waste material consists of water purification resin sludge which has been accumulating in two on-site settling ponds since facility operation was authorized in 1977. The resin is used in the plant in two separate but similar applications. One application, the one that produces the most waste, is to purify raw water before it is used in the plant. This application does not result in radioactively contaminated waste. The other application is to purify secondary system water

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before it is returned to the steam generators to produce steam for use in the power conversion cycle. Possible leaks through the steam generator tubes from the primary water cooling the reactor will carry some radioactive material into the steam system which can be removed by the water purification resins located in the secondary system. Radioactive contamination of these resins is normally very low since Davis-Besse has had an excellent record with respect to steam generator tube leakage. The longest half-life associated with the contamination does not exceed 30 years and about 65% of the contamination has a half-life of 5 years or less.

When the purification resins are no longer effective in performing the purification function, they are transferred to a holding tank for monitoring and are replaced with fresh resin. Samples are taken to measure the amount of radiation present on the used resin. If significant radioactivity is present, the resins are transferred within the plant to be further processed and prepared for shipment to licensed radioactive waste disposal sites. If no significant radioactivity is measured, the resins are discharged to the settling ponds. This process provides assurances that only very low-level wastes are transferred into the settling ponds.

The resins which are discharged to the settling ponds settle to the bottom of the ponds where they accumulate along with resins discharged from the raw water purification process. The water which is used to flush the resins to the settling ponds is discharged to Lake Erie. Periodically, the accumulated resins must be removed from the ponds by dredging and disposed of.

The NRC approval for onsite disposal is only one of several permits or approvals the Toledo Edison Company must obtain prior to actual disposal of the material. The Ohio EPA and other agencies will also have an opportunity to review the proposal for conformance with existing state and local regulations.

We trust that this letter has been fully responsive to the issues raised. Please contact us if we can be of further assistance.

Sincerely,

(Signed) T. A. Rehm

for Victor Stello, Jr.
Executive Director
for Operations

PBD-6 *CPA*
Ade Agazio;jk
5/12/86

PBD-6 *CM*
CMcCracken
5/9/86

PBD-6 *J*
JStolz
5/13/86

D-~~CPA~~ B
FM *Maglia*
5/15/86

DD *NRR*
BEisenhut
5/12/86

D *HR*
Hinton
5/1/86

EDO *R*
VStello
5/19/86

cc A
SK
5/20/86

DISTRIBUTION FOR GREEN TICKET # 001678

Docket File or Central File

NRC PDR w/inc.

L PDR w/inc.

EDO #001678

EDO Rdg

H. Denton/D. Eisenhut

PBD-6 Rdg

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SECY

VStello

PPAS, D. Mossburg #001678

FMiraglia/MSchaaf

Ade Agazio w/inc.

RIngram

PBD-6 Green ticket file, P-214 w/inc.

JGDavis

TMurley

JKeppler

OCA

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(Signed) **T. A. Rehm**

T. A. Rehm
Victor Stello, Jr.
Executive Director
for Operations

PBD-6 *ava*
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PBD-6 *CMcCracken*
CMcCracken
5/9/86

PBD-6 *JStolz*
JStolz
5/13/86

D-EDB *FMiraglia*
FMiraglia
5/13/86

DD:NRR
DEisenhut
5/ /86

D:NRR
HDenton
5/ /86

EDO
VStello
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RIngram

PBD-6 Green ticket file, P-214 w/inc.

JGDavis

TMurley

JKeppler



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ACTION

EDO PRINCIPAL CORRESPONDENCE CONTROL

FROM:

DUE: 05/0²³8/86

EDO CONTROL: 001678
DOC DT: 04/15/86

REP. DELBERT L. LATTA

FINAL REPLY:
151 Kohn ft Stello
5/2/86

TO:

KAMMERER

FOR SIGNATURE OF:

** GREEN **

SECY NO: 86-392

EXECUTIVE DIRECTOR

DESC:

ROUTING:

ENCLOSURE LETTER FROM MARJORIE J. LACY RE DUMPING
OF RADIOACTIVE SLUDGE INTO LAKE ERIE - DAVIS BESSE

DAVIS
MURELY

DATE: 04/25/86

ASSIGNED TO: NRR

CONTACT: DENTON

SPECIAL INSTRUCTIONS OR REMARKS:

NRR RECEIVED: 04/25/86

ACTION: ~~DPLB-MIRAGLIA~~ *Stab*

NRR ROUTING: DENTON/EISENHUT
PPAS
MOSSBURG/TOMS *RF*

