



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
AUG 6 1980

Docket No. 50-320

Mr. R. C. Arnold
Senior Vice President
Metropolitan Edison Company
100 Interpace Parkway
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Dear Mr. Arnold:

This letter is in response to your letter (TLL 315) of June 30, 1980 and addresses the issues of NRC approval of the submerged demineralizer system (SDS), solid waste disposal, a contingency plan for alternate storage of reactor building sump water, and formation of an oversight group for review of cleanup activities.

Submerged Demineralizer System

In your letter, you request that the "NRC take the steps necessary to permit approval of the operation of the SDS consistent with the availability of the system for operation." You stress that it is important to decontaminate the reactor building sump water as promptly as possible because of the potential for the water "developing into an emergency situation."

While we agree that immobilization of the radioactivity contained in the reactor building sump water will be an important accomplishment in reducing the real and potential threat to public and occupational worker health and safety, we do not currently view processing of the water as a sufficiently urgent problem to require resolution prior to publication of the staff's final Programmatic Environmental Impact Statement (PEIS). This position is consistent with that of the Commission as elaborated in their Memorandum and Order of October 16, 1979 authorizing the operation of EPICOR-II and in their Statement of Policy of November 21, 1979. Barring emergency situations which might require prompt Commission action, or other circumstances which cause the Commission to decide it is in the best interest of the public health and safety to proceed in advance of a final PEIS, it is the Commission's intent to evaluate all alternatives for disposition of the reactor building sump water and involve the public in the Commission's decision-making process prior to granting approvals for specific cleanup choices, in accordance with the objectives of NEPA. As you know, the vehicle for implementing the objectives of NEPA is the staff's PEIS. We anticipate that the final PEIS will be issued by the end of this year.

NRC's decision on this question will be based on examination in the PEIS of alternatives for disposition of reactor building sump water. In the meantime,

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the staff will continue its technical review of the design and operating aspects of the SDS in response to your submittal of April 10, 1980 (TLL-160, Technical Evaluation Report - Submerged Demineralizer System) and future licensee submittals. Thus, unless the status of the reactor building warrants alternative actions, NRC will not approve operation of any system until the full NEPA and safety review is complete and the best alternative is chosen for protection of the health and safety of the occupational workers and the public.

Solid Waste Disposal

We stated in our letter of May 28, 1980 to you (and Mr. Dieckamp) that we would provide further guidance concerning the ultimate disposition of high specific activity solid waste (e.g. first stage SDS resins). During the past few months, NRC representatives of the Office of Nuclear Reactor Regulation and Office of Nuclear Material Safety and Safeguards have held joint meetings with representatives of the Department of Energy to explore all alternatives for the ultimate disposition of solid waste which may not be suitable for disposal in commercial low level waste burial sites. These meetings will continue in the future and we anticipate that your organization will also participate. The alternatives for ultimate disposition of this waste are elaborated in our draft PEIS, currently nearing completion, which will be available for public comment very shortly.

We would recommend that, after you have had an opportunity to review the discussion of solid waste handling and disposal in the draft PEIS, we arrange a meeting to discuss the desired waste form and container (liner) design to ensure compatibility with the options for ultimate disposition. For example, should the SDS be approved, the first stage liner design should incorporate the capability for sluicing the resins out of the liner for further processing.

As the resolution of the waste disposal issue has already been given high priority and discussions between the NRC and DOE have been ongoing and will continue (with your participation) in the future, we do not see the need, at this time, to establish a more formal interagency task force as you suggested.

Contingency Plan for Alternate Storage of Reactor Building Sump Water

In your letter (TLL 315), you stated that you were reviewing the options available for removal of the reactor building sump water in the event that action becomes necessary. It was not intended in my May 28 letter to suggest that construction of additional tank facilities was the only alternative to transfer the sump water. If a satisfactory contingency plan for handling an emergency situation can be developed utilizing existing TMI facilities, obviously this should be considered as the preferred alternative. In my May 28 letter I requested that you advise within two weeks when we may expect a contingency plan for our review. Since this plan has not yet been received, I expect to obtain a commitment date from you within one week.

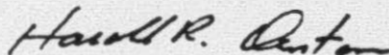
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Periodic Oversight

Concerning the GPU recommendation of March 4, 1980 (H. Dieckamp to J. Ahearne), reiterated in your June 30 letter, for formation of an oversight group with representatives from GPU, NRC and the Commonwealth of Pennsylvania to review and evaluate the status of cleanup activities, I agree periodic status reviews should be scheduled. It is suggested that monthly, or bimonthly, management review meetings be held. I have designated Dr. Bernard J. Snyder, Program Director, TMI Program Office to be the senior NRC representative for this purpose. I also agree that representation from the Commonwealth of Pennsylvania is desirable and have discussed that possibility with Mr. Clifford Jones, Secretary, Pa. DER.

We would welcome any thoughts you might have on these matters.

Sincerely,



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

cc: H. Dieckamp, GPU
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