



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

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MAR 20 1981

Docket No. 50-320

Mr. Gale K. Hovey
Vice President and
Director for TMI-2
Metropolitan Edison Company
P.O. Box 480
Middletown, Pennsylvania 17057



Dear Mr. Hovey:

This letter is in response to your letter (LL2-81-0033) of February 23, 1981 in which you requested approval to use EPICOR-II to process reactor coolant system (RCS) water. In a subsequent meeting at TMI on March 13, 1981, our respective staffs discussed the details of your proposal.

In your request, you propose to use only inorganic ion-exchange media in the EPICOR-II prefilters in lieu of organic resins, however, you propose to limit the curie loading on the prefilters to the same administrative limit (i.e., 1300 curies) that has applied to past EPICOR-II operation. Although the staff is in agreement with the use of inorganic ion-exchange media in the prefilters, the staff does not agree with your proposed processing philosophy for a variety of reasons.

Loading the prefilters to only 1300 curies does not represent efficient use of the inorganic media and violates the principle of volume reduction. Your proposed method of operation would result in the generation of more liners than necessary, perhaps 5 times more, with the attendant occupational exposure associated with liner handling and placement in storage. Additionally, your method of operation would result in the generation of waste whose ultimate disposition is uncertain. Given the higher levels of strontium radionuclides in the RCS water, the suitability of the waste generated from processing this water for shallow land burial is uncertain.

In the staff's view, it seems prudent to minimize the volume of waste generated by maximizing the loading on each liner, consistent with the limitations of appropriate shielding during handling operations. This waste would resemble the waste you anticipate will be generated during the operation of the Submerged Demineralizer System (SDS) and the DOE has indicated in budget proposals that this high specific activity inorganic waste would be desirable for research and development activities (e.g., vitrification) at a DOE facility.

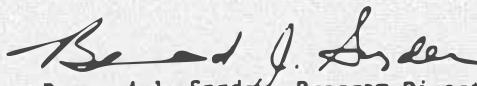
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Mr. Gale K. Hovey

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Thus, we find your proposal unacceptable in its present form but would consider alternative plans for the processing of RCS through EPICOR-II, consistent with the principal of volume reduction as described above. I would be happy to discuss this matter with you.

Sincerely,


Bernard J. Snyder, Program Director
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