

Metropolitan Edison Company Post Office Box 480 Middletown, Pennsylvania 17057

Writer's Direct Dial Number

February 2, 1981

TMI Program Office Attn: Mr. Lake Barrett, Deputy Director U. S. Nuclear Regulatory Commission c/o Three Mile Island Nuclear Station Middletown. Pennsylvania 17057

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Liner Module Sump Contamination

Forwarded herewith in accordance with our LL2-81-0019 of January 27, 1981, is our report on the Liner Module Sump Contamination.

We will continue to keep you advised of our findings.

If you have any questions on this, please let me know.

Sincerely,

G. K. Hovey

Director, TMI-2

GKH:RIN:d1b

Enclosures

cc: Bernard J. Snyder, Program Director, TMI Program Office

Ago!

Metropolitan Edison Company is a Member of the General Public Utilities System

Kent 1011:

THREE MILE ISLAND NUCLEAR STATION
UNIT 2 (TMI-II)

OPERATION LICENSE NO. DPR-73
DOCKET NO. 50-320

SOLID WASTE STAGING FACILITY
SUMP CONTAMINATION REPORT

T. Shelton January 28, 1981 INTRODUCTION

1.0

General

Liners containing spent ion exchange media from the operation of EPICOR-I and EPICOR-II are stored in an Interim Storage Facility (ISF), and in the Solid Radwaste Staging Facility (SWSF). The latter is provided with drains to a sump from which collected water can be pumped, monitored, and ultimately disposed of in an appropriate manner. Very low levels of radionuclide contamination have been found in this water. This report presents findings to date from investigations of this contamination. In addition, until recently, EPICOR-I and EPICOR II liners were stored in the ISF. Tritium contamination was found in two ISF storage locations after the liners that had been stored were transferred to the SWSF. All the contamination levels are considerable below 10CFR Part 20 limits for discharge to unrestricted areas. However, as the contamination is measurable and above back-ground levels, monitoring of the sump will continue.

Scope

This report sets forth:

*Probable sources of water *Analyticial results *Conclusions *Future activities

2.0 PROBABLE SOURCES OF WATER

SWSF

2.1

The sump liquid level has been monitored regularly since August of 1980. From that date through January 15, 1981, the sump liquid level has increased 3 inches, which corresponds to approximately 70 gallons. Total water in the sump on January 15. 1981, was about 150 gallons. Visual inspection of the sump indicates that the major constituent of water inleakage to the sump is probably rainwater via a defective gasket in the sump access manhole. This was substantiated by covering the A and B storage module drain inlets to the sump for several weeks with plastic bags and observing the amounts of liquid collected. Periodic observation of water volumes in these bags indicated small amounts of water collected as a function of time (on the order of several ml per week) followed by a large volume collected (on the order of a gallon per day). This larger volume collected coincided with start up and test work related to check out of conductivity probes designed to detect the presence of water in the drain outlets, and negated the validity of any water collected and sample analyses were not performed.

:2

Examination of the storage modules has indicated that small amounts of rainvater may be entering some storage cells (and therefore the sump) via faulty sealing between the shield plugs and gaskets, since nylon lifting straps penetrate the sealing surface in all cells containing 6 x 6 liners or stacking platforms.

2.2 ISF

Liquid has been found in the bottom of a number of the cells of the ISF (cells 2 and 20). While no obvious pathway has been observed, it is postulated that the principal source of this water also is rain.

ANALYTICAL RESULTS

3.1 Data

3.0

3.2.1

Several sets of analytical results are appended hereto:

*Table 3.1-1 SWSF sump sample radioactive analysis results
*Table 3.1-2 SWSF sump sample and TMI environmental groundwater monitoring well sample chemical

monitoring Well sample Chemica analysis. *Attachment l Teledyne radioactive analysis

::

results of water and sediment
samples from areas near the SWSF.
*Attachment 4 Teledyne radioactive analysis
results of SWSF sump water.

3.2 <u>Discussion</u>

SWSF Sump

residue.

Results of SWSF sump liquid samples dating back to April 5, 1980 (see Table 3.1-1) have been obtained and analyzed. Initial sump contamination was observed in a July 2, 1980, sample. Gross Beta-Gamma of 6.15 E-8 uCi/ml), and was subsequently verfied in a July 16, 1980, sample. Tritium has been detected in samples since July 16, 1980, and has remained virtually constant at E-O5uCi/ml levels. Early in November 1980, a sump sample was sent off-mite to SAI. Results of this snalysis indicate the presence of cessium 137 (122 E-O8uCi/ml). This presence of cessium has not been verified via other sample results; however, other offseit samples to date have not been counted subsequent to sample liquid evaporation. Teledyne has been instructed to boti down the December 5, 1980 sample and analyze the

Possible inleakage of groundwater

The concentrations of radionuclides determined as shown in Attachment I are not shormed when compared to other groundwater and sediment present at the TMI site. Thus, there is no indication of leakage from the sump to groundwater. However, this subject will continue to be pursued as part of the ongoing monitoring program as in Attachment 3. 3.2.3 ISF Cells

In addition to the analytical results attached hereto, analyses were made of samples of the vater found in the ISF cells. The tritium content was found to be only 3.4 E-5ucf/ml in Cell No. 20 and 6.0 E-5ucf/ml in Cell No. 20, while results from other cells from which samples were taken indicate no tritium present.

3.3.4 Comparision to Part 20

Important to consideration of the possible hazard related to the sump water contamination is the fact that the 10CFR Part 20, Appendix B, Table II, Column 2 limit for concentration of critium in vaser discharged to unrestricted areas is $3x10^{-3}$, well over an order of magnitude higher than the sump water tritium content. Similarly the Part 20 limit for cessum-137 is $2x10^{-5}\,\mathrm{sC}/m_1$, over two orders of magnitude above the sump water concentration.

4.0 CONCLUSIONS

4.1 Potential hazard

The concentrations of both tritium and cesium-137 in the sump water are significantl; below limits in 10CFR Fart 20 for water to be discharged to unrestricted areas.

4.2 Source of water

It is probable that the principal source of water found in the sump is rainwater. It is very unlikely that groundwater io leaking into the sump.

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4.3 Source of contamination

It is known that air containing water vapor will escape through treaded, plugged connections on the liners at some Zpsig. With changes in temperature, the pressure in the liners will fluctuate, making "breathing" a likelihood. This could well be the source of the trittum found. Cestum could come from minor external contamination of the liners carried by water which entered the cell via the mylon lifting straps (Paragraph 2.1, above) and flowing over the liners to the drains and themce to the sump. To date, 10 conclusive data exist that confirms liner leakage. Neither does conclusive evidence exist that confirms in the confirment of the confirment confirment of the confirment contains the cours of the tritium contamination.

5.0 FUTURE ACTIVITIES

5.1 Water Inleakage

5.1.1 SWSF Sump

In order to limit water inleakage directly into the sump, the sump access manhole gasket will be replaced. Also, the manhole cover will be modified in such a manner so as to limit gasket damage when removing and replacing the manhole cover.

So that contamination sources may be more clearly defined, the A and B module drain inlets to the sump will remain in place and be periodically checked for water collection. If a sufficient amount of water is collected from either drain, the contents will be analyzed and results forwarded to the NRC.

5.1.2 SWSF Modules

As time permits, the nylon straps which penetrate the sealing surface between the shield plugs and gaskets will be modified to alleviate this water transport mode into the storage module cells.

5.2 Monitoring Programs

It is our position that direct leakage of liquid from stored liners can be detected by changes in sum water chemistry and/or radionuclide content. Accordingly, base line information which has been and is being accumulated, can be used for comparision with any future data which might show a marked change in contamination. In support of this, a sampling program has been initiated to obtain periodic onsite and offsire analysis of the SNST sump liquid. This program will include radiotiotopic and chemical analysis of the swmp liquid (Attachment 2).

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5.2.2 An environmental monitoring program has also been initiated to periodically sample surface vater and sediments in the south drainage ditch and water from excavation areas near the SWSF. Additionally, installation of monitoring wells in the SWSF area is currently being studied (Attachment 3).

TABLE 3.1-1 SWSF SUMP SAMPLE RADIOACTIVE ANALYSIS RESULTS

| SAMPLE NO. | DATE | TRITIUM (MC:/mf) | GROSS BETA-GAMMA | GAMMA-SCAN (4Ci/ml) | COMMENTS |
|------------|----------|------------------|------------------|------------------------|---------------------------------------|
| 36790 | 4/5/80 | LLD | 1 | LLD | |
| 36791 | 4/5/80 | LLD | | LLD | |
| 42443 | 6/12/80 | LLD | LLD | LLD | |
| 43365 | 6/25/80 | | | LLD | |
| 43366 | 6/25/80 | | | LLD . | |
| 44275 | 7/2/80 | LLD | 6.35E-08 | | |
| 44276 | 7/2/80 | | | LLD | |
| 44935 | 7/9/80 | LLD | LLD | LLD | |
| 44936 | 7/10/80 | | | LLD . | |
| 45483 | 7/15/80 | | | LLD | |
| 45484 | 7/15/80 | LLD | LLD | | |
| 45619 | 7/16/80 | 7.75E-05 | 1.68E-07 | LLD | |
| 46068 | 7/22/80 | | | LLD | |
| 49144 | 9/8/80 | | 1.34E-07 | LLD | |
| 50243 | 9/29/80 | 5.4E-05 | - | LLD | |
| 50244 | 9/29/80 | 7.2E-05 | LLD | | |
| 51681 | 10/29/80 | 3.9E-05 | | 1.2E-08 (Cs-137) | Gross Beta 1.4E-07 4(-/m# sent to SAI |
| 52898 | 11/25/80 | 2.8E-05 | LLD | LLD | |
| 77121 | 12/5/80 | 2.6E-05 | | LLD | TELEDYNE-NOT BOILED |

The symbol "--" denotes no analysis of the designated type

TABLE 3.1-2 SWSF SUMP SAMPLE AND THI ENVIRONMENTAL GROUNDWATER MONITORING WELL SAMPLE CHEMICAL ANALYSIS

| ANALYSIS | SWSF SUMP | GROUNDWATER (RANGE) |
|-----------------------------|------------------------------------|---------------------|
| ph | 7.93 | 6.47-9.91 |
| CONDUCTIVITY umho/cm | 960 | |
| TOTAL SOLIDS mg/1 | 562 | 1070 |
| TOTAL DISSOLVED SOLIDS mg/1 | 555 | |
| TOTAL SUSPENDED SOLIDS mg/1 | 7 | |
| SULFATE mg/1 | 58 | 0.10-0.35 |
| CHLORIDE mg/1 | 9.7 | 9-23 |
| SILICA mg/1 | 13.5 S ₁ 0 ₂ | 3.5-13.6 . |
| TOTAL PHOSPHORUS mg/1 | 0.51PO4-P | 0.01-4.16 |
| AMMONIA NITROGEN mg/1 | 3.63NH ₃ -N | |
| NITRATE NITROGEN mg/1 | 16.0 NO ₃ -N | |
| SODIUM mg/l | 50.0 | 11-107 |
| TOTAL IRON mg/1 | 1.82 | 1.1-11 |
| TOTAL CALCIUM mg/l | 27.2 | 107-1070 |
| TOTAL MAGNESIUM mg/1 | 7.3 | 11-107 |
| TOTAL ALUMINUM mg/1 | 0.1 | 11-107 |
| TOTAL ZINC mg/1 | 0.50 | 0.11-1.1 |

| 12/11/6 | - | | | į | | |
|--------------------|----------------------|---|---------------|--|--|--|
| RUB DATE 12/11/8 | | ŧ | | VOLUME - UNITS ASH-UGHT-E . | | • |
| | D DELITERY DATE | | | HID-COURT TIME DATE TIME | 120 120 120 120 120 120 120 120 120 120 | |
| | DATE RECEIVED | 12,05,80 | | PUCL-UNIT-1 | | |
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Attachment 1

*Sampling locations are indicated on page 6 of this attachment

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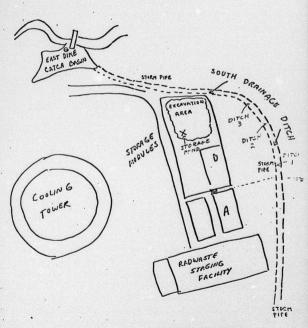
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7 - GAS LAF. POOR

Approximate Locations Where Samples Were Taken



POOR ORIGINAL

Attachment 2

METROPOLITAN EDISON COMPANY Subsidiary of General Public Universe Corporation

Long-Term Storage Modules (A & B) Subject Sump - Sampling Program

TMI-II-R-47000 Location TMI/U-2 Site Ops Date January 20, 1981

...

To B. D. Elam K. L. Harner

> Due to recent GPU and NRC concerns with respect to the Long-Term Storage Modules (A & B) sump contamination and Epicor liner integrity, please initiate a sampling program. As a minimum, the sampling program should be in accordance with the following:

1. Liquid Storage Module (A & B) Sump: One gallon Once per week

Frequency -

Location . On site

Tritium, Gamma Scan, Gross Beta Gamma. Then boil down sample and perform another Gamma Scan and Analysis Gross Beta Gamma count on the residue.

2. Liquid Storage Module (A & B) Sump: One

gallon

Frequency Once per month Location Off site (SAI) Analysis Same as in (1.) above.

Storage Module (A & B) Sump; One 3. Liquid

gallon Once per month Frequency -

Off site (SAI) Chemical (per Attachment 1) Location Analysis -

Please provide copies of the results for the above samples, as well as any other samples you deem necessary, to J. Daniel and myself in a timely manner. If you have any questions concerning this program please feel free to contact the undersigned at X-8329.

T.A. Shellow

TAS/jw attach.

CC: J. J. Barton, J. A. Daniel, C. P. Deltete, J. Hess G. K. Hovey, File

INTER-OFFICE MEMORANDUM

January 6, 1981

[HAI] Service

Subject THREE MILE ISLAND NUCLEAR STATION

W. E. Riethle

7 .:0

Location Hbg. Int'l Airport

In response to recent concern expressed by the NRC relative to potential environmental contamination of ground and surface water originating from the above referenced facilities, the following steps have been initiated:

- As of December 8, 1980, sampling of surface water and sediments in the south drainage ditch was incorporated into the weekly groundwater monitoring program. Sampling locations are presented in Figure 1 (attached).
- Monitoring of the East Dike Catch Basin (EDCB) has been enforced on aucekly basis since carly November and will be continued as part of this monitoring regime. The EDCB serves as the monitoring point prior to intercent with the river.
- On a monthly basis, the "excavation pond" adjacent to the storage module will also be sampled as water is available.
- 4. The installation of monitoring wells around the storage module is being examined by Grc 'Niterr Technology. Their incommendations are due to us by January 10, <1. At this time the necessary steps will be taken to implement Tec's womendations.</p>
- Water and sediment samples obtained from this program will be sent to Teledyne Isotopes for gamma scan analysis and tritium.

This program will provide the necessary information relative to any environmental contamination of the water pathways from the storage modules.

G. G. Baker, Ph.D

GCB/klt

Attachment

cc: P. Deltete

R. I. Newman

M. B. Roche T. J. Walsh

File: 2249.2.3

GPU Service Corporation is a subsidiary of Guneral Public Utiles Corporation

X-WATER AND SEDIMENT SAMPLE

A - WATER SAMPLE DALY SOUTH. DRAMAGE DACE EAST DIRE 50-3 X SA-1 STEPHOES COOLING FOWER RADINASTE STREING FACILITY

POOR ORIGINAL

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TELETINE ISOTORES

Attachment 4

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