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December 4, 1981

TMIPO/81-066

Mr. John J. Barton  
 Acting Director TMI-2  
 Metropolitan Edison Company  
 Box 480  
 Middletown, PA 17057



Dear Mr. Barton:

We have reviewed your letter LL2-81-0216 dated September 11, 1981, and can not accept your response to our question number two. The question concerns the Interim Waste Staging Facility (IWSF) as transmitted in our letter dated July 28, 1981, and stated, "GPU should describe their physical/administrative controls for effluent monitoring in these sumps, and controls to assure proper disposal/treatment". Your response states that if contaminated liquids are detected in the sump of the IWSF in concentrations less than those of Column 1, Table 1 of Appendix B to 10CFR Part 20, that the water would be discharged to the storm drain system (and indirectly to the river). We do not consider this criteria alone to be in accordance with 10CFR 20.106 and the ALARA principles of 10CFR 20.1. Water which may be detected in the IWSF should be treated in accordance with an overall liquid waste management plan for TMI Unit 2. Our position is that your overall liquid waste management plan shall implement the following criteria.

1. Accident generated water (attachment 1) shall not be discharged, as specified in Section 3.9.13 of Appendix A to your License No. DPR-73, Technical Specifications, and the June 18, 1981, Order by the Director of the Office of Nuclear Reactor Regulation. No accident generated water may be discharged until: (1) you make a proposal, (2) we perform a safety and environmental analysis of your proposal and provide the recommendations to the Commission, and (3) the Commission makes a final determination on the acceptability of any proposed ultimate disposition.
2. Liquids, other than accident generated water, may be discharged to the river provided strict controls are in place to ensure that the release is:
  - a) Adequately sampled, and monitored to accurately quantify radionuclides, concentrations and quantities,
  - b) Controlled to ensure that all license conditions are satisfied and the release complies with the ALARA principles of 10CFR 20.1, and
  - c) NRC representative is informed prior to the release.

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 P PDR

Mr. John J. Barton

-2-

Your program should incorporate the above criteria, and be implemented by written procedures to be reviewed and approved by my staff in accordance with your Technical Specifications. It is requested that you prepare such procedures and submit them to the TMI Program Office for approval by February 1, 1982. Attachment 2 contains guidelines for implementation of the above criteria that we would find acceptable. We are available to discuss alternative approaches to achieve the same results at your convenience.

Sincerely,

-S-

Lake H. Barrett  
Deputy Program Director  
TMI Program Office

Attachments: As Stated

cc: See Service Distribution List

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## ATTACHMENT 1

Accident generated water\*, which is specifically defined as:

- (a) Water that existed in the TMI-2 auxiliary, fuel handling and containment buildings including the primary systems as of October 16, 1979, with the exception of water which as a result of decontamination operations becomes commingled with nonaccident-generated water such that the commingled water has a tritium content of 0.025  $\mu\text{Ci/mL}$  or less before processing.
- (b) Water that has a total activity of greater than 1  $\mu\text{Ci/mL}$  prior to processing except where such water is originally nonaccident water and becomes contaminated by use in cleanup.
- (c) Water that contains greater than 0.025  $\mu\text{Ci/mL}$  of tritium before processing.

\*As defined in the PEIS and Settlement Agreement between City of Lancaster, NRC and Metropolitan Edison et. al., dated February 27, 1980.



## ATTACHMENT 2

### ACCEPTABLE GUIDELINES FOR UNIT 2 OVERALL LIQUID WASTE MANAGEMENT IMPLEMENTATION PROCEDURES

1. Discharge of accident generated water is prohibited.
2. Implement appropriate sampling, analysis and monitoring to detect possible radioactive contamination in the Industrial Waste Treatment System (IWTS), associated source subsystems, or other liquid inputs to these systems that could be potentially contaminated (procedures should specify methods to be used).
3. Prohibit release of contaminated liquids to systems which directly or indirectly discharge to the river unless a decision has been made by the GPU organization that it is not "reasonable" to prevent or mitigate the release in accordance with 10CFR 20.1 (ALARA). The on-site NRC staff is to be informed at least 4 hours in advance of any release of contaminated liquids to the IWTS or related subsystem, and immediately if an uncontrolled and/or unauthorized release to the river has been made. When informing the NRC of an impending release, GPU should fully explain why the release should not be prevented or further mitigated in accordance with ALARA philosophy. This explanation should include the following information:
  - a) Amounts and types of radioactive material involved.
  - b) Source of the radioactive material.
  - c) Volume of liquid involved.
  - d) Types of sampling and analysis performed.
  - e) Options considered by GPU to prevent the release and why they were rejected.