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**GPU Nuclear**

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October 6, 1987  
4410-87-L-0149/2134  
(Corrected Copy)

U.S. Nuclear Regulatory Commission  
Commissioner L. W. Zech - Chairman  
Commissioner T. M. Roberts  
Commissioner F. M. Bernthal  
Commissioner K. M. Carr  
Commissioner K. C. Rogers  
Washington, DC 20555

Dear Sirs:

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 2 (TMI-2)  
Operating License No. DPR-73  
Docket No. 50-320  
Disposal of Accident-Generated Water

On July 31, 1987, the Commission published in the Federal Register a notice of opportunity for prior hearing on GPU Nuclear's request for a license amendment to delete the current technical specification prohibition on the disposal of TMI-2 accident-generated water. In response to the notice, two requests for hearing/petitions for leave to intervene have been filed and an Atomic Safety and Licensing Board has been established and is now considering the requests and petitions.

The purpose of this letter is to provide our latest assessment of the TMI-2 Cleanup program schedule and the potential effect of the water disposal schedule on the completion of cleanup. Based on this assessment, we request that the Commission assign sufficient staff resources to support both expedition in the adjudicatory proceeding and ongoing review and oversight of the cleanup program.

Attachment 1 provides a chronology of some major steps taken since GPUN first discussed the matter of the accident water with the Commissioners in a public meeting in January 1986. GPU Nuclear's proposed method of disposal (ion exchange, followed by evaporation with residue disposal as commercial low-level waste) has been endorsed by the

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NRC Staff in its Final Environmental Impact Statement, and by the Safety Advisory Board for TMI-2. The National Council for Radiation Protection found that the health and safety of the public would not be affected by release to the atmosphere. The Department of Energy concluded that "we believe the environmentally preferred alternative appears to be onsite evaporation." The U.S. Environmental Protection Agency concluded that "there are no significant radiation impacts from the proposed alternatives identified..." Additional supportive comments were received from the Pennsylvania Department of Health and the Maryland Department of Natural Resources, as well as the Pennsylvania delegation to the United States Congress, conditional on a finding that disposal was technically feasible and environmentally safe.

As stated in the NRC's Programmatic Environmental Impact Statement Final Supplement Dealing with Disposal of Accident-Generated Water:

Ultimate disposal of the water is considered a fundamental element in accomplishing the overall cleanup of TMI-2. Relatively near-term action to safely dispose of the water would support the Commission's goal of safe and expeditious cleanup of the facility.  
Nureg-0683 Supplement No. 2 Final Report at viii (June 1987)

Approval of the processed accident water disposal is pivotal to completion of the disposal process itself and the end of cleanup at TMI-2. The necessary prerequisites for cleanup completion require draining, flushing, and decontamination of a number of systems, including the Reactor Coolant System, the fuel pools and other plant systems containing accident-generated water. The current cleanup schedule, which includes draining these systems, was based upon water disposal plan approval in July 1987 and initiation of processed water disposal in early 1988. (NOTE: As much as six months may be required to place the system in operation once the contractor has been authorized to commence fabrication of the system.)

The other major activities needed to arrive at the end of the TMI-2 cleanup program are moving rapidly toward completion. Recent progress in the defueling activity is particularly noteworthy. More than one-half of the core debris has been removed from the reactor vessel and either is being prepared for shipment or has been shipped to the Department of Energy.

Under the best of circumstances, the Licensing Board proceeding -- which we understand must be completed prior to a Commission decision -- will complicate and delay the final stages of cleanup of TMI-2. We intend to press upon the Atomic Safety and Licensing Board the need for expedition in the conduct of the adjudication, in order to minimize the delay in cleanup completion. In parallel, timely review and approval of certain safety analyses required for ongoing cleanup activities, including defueling and preparation for PDMS, will be essential to the program schedule. Revision and update of the TMI-2 Technical Specifications and Recovery Operations Plan, a continuing process as plant conditions change, also will require timely NRC staff action.

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We request, therefore, that the Commission assist in minimizing the adverse schedule effects of the accident water proceeding by ensuring the availability of necessary staff resources to support both participation in an expedited hearing process and timely oversight and support for the ongoing cleanup operation.

Sincerely,

/s/ E. E. Kintner

E. E. Kintner  
Executive Vice President

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Attachment

cc: Docketing and Services Branch

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Ms. Frances Skolnick - Susquehanna Valley Alliance

Ms. Vera L. Stuchinski - Three Mile Island Alert

Thomas Baxter, Esquire - Shaw, Pittman, Potts, & Trowbridge

Ernest L. Blake, Esquire - Shaw, Pittman, Potts, & Trowbridge

## CHRONOLOGY

TMI-2 ACCIDENT-GENERATED WATER DISPOSAL

January 14, 1986 Commission requested GPU Nuclear to submit a proposal to dispose of accident-generated water.

July 31, 1986 GPU Nuclear submitted disposal recommendation (i.e., evaporation) to NRC.

December 1986 NRC published Draft Supplement 2 to PEIS for comment.

January 1987 NRC Advisory Panel on Decontamination of TMI-2 conducts first of three (3) public meeting on issue.

February 25, 1987 GPU Nuclear submitted TSCR #56 to NRC to delete ban on processed water disposal.

April 16, 1987 Advisory Panel meets with NRC to discuss GPU Nuclear water disposal proposal.

May 14, 1987 GPU Nuclear letter to Commission requested approval of water disposal recommendation by July 31, 1987.

June 1987 Supplement No. 2, PEIS presented to Commission with staff recommendation to approve accident-generated water disposal by evaporation.

July 31, 1987 Commission published Notice of Opportunity for Prior Hearing - 52 FR 28626.

September 1987 Petitions for hearings and leave to intervene filed. Atomic Safety and Licensing Board appointed.