

April 4, 1980

SECY-80-175

## COMMISSIONER ACTION

For: The Commissioners *W. J. ...*

Thru: Executive Director for Operations

From: Harold R. Devon, Director  
Office of Nuclear Reactor Regulation

Subject: INTERIM CRITERIA FOR RADIOLOGICAL EFFLUENTS FROM  
TMI-2 DATA GATHERING AND MAINTENANCE OPERATION

Purpose: Approval of radiological effluent criteria for TMI-2 for the interim period prior to the issuance of the programmatic environmental impact statement for the purpose of data gathering and maintenance operations.

Discussion: The staff is currently in the process of preparing a programmatic environmental impact statement (PEIS) for TMI-2 which will address the impact of all radiological releases that will occur as a result of the cleanup operations for Three Mile Island, Unit 2. These operations will begin upon Commission approval, after the PEIS is published in final form provided the proposed cleanup programs have been found to be environmentally acceptable. In the interim period it is necessary for the licensee to continue authorized decontamination activities in the auxiliary building and to conduct data gathering and maintenance operations at the TMI-2 facility. This paper describes interim radiological effluent release criteria which would be applicable to the release of radioactive effluents associated with operations conducted by the licensee. The criteria presented here have been developed to apply to all releases that will result from ongoing decontamination activities and planned data gathering and maintenance operations in the interim

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SECY NOTE: This subject is scheduled to be discussed at a meeting on Monday, April 7, 1980.

period from the present until the PEIS is completed and approved. Releases which are specifically not covered by these criteria are purging of the reactor building atmosphere, disposal of EPICOR-II water, and treatment and disposal of high level radioactively contaminated water in the reactor building. Consideration of decontamination of the reactor building atmosphere is discussed in NUREG-0442 and Addendum 1&2. Staff recommendations for handling the reactor building atmosphere have been presented in a commission action paper (SECY-80-132) dated March 11, 1980. The handling of the EPICOR-II water and the water in the reactor building will be discussed in the PEIS. However, consistent with the Commission's November 21, 1979, Statement of Policy, should it be in the best interests of the public health and safety to decontaminate the high level waste water in the reactor building, appropriate action will be taken prior to completion of the PEIS. The approval of these operational criteria will enhance the ability of the licensee to continue decontamination activities in the auxiliary building, maintain the reactor in a safe configuration, and plan effectively for recovery operations.

The interim criteria described below provide a mechanism by which the licensee may request to make small radioactive releases resulting from data gathering and maintenance operations. These criteria describe the information that the licensee must submit to the NRC for approval prior to performing these operations, and the type of review that the staff will perform in determining whether or not to approve each request. These criteria are as follows:

- The licensee must request approval from the NRC to perform data gathering and maintenance operations. In addition, separate procedures must be developed for each operation and submitted to the NRC for approval. These procedures must contain a description of the need for the operation, estimates of radioactivity that may be released, and estimates of onsite and offsite doses that may occur as a result of the operation. The procedures for each operation should be designed to conform to the existing NRC technical specifications as well as to the "As Low As

Reasonably Achievable\* (ALARA) concepts of 10 CFR Parts 20 and 50. The procedures developed by the licensee should not interfere with the applicability of other limitations, conditions, or agreements that the licensee may have regarding the releases of radioactive gaseous or liquid effluents with NRC, or with other federal, state or local authorities.

- These procedures will be reviewed by the NRC to ensure that they meet the existing technical specifications, that the (ALARA) concepts of 10 CFR Part 20 and 10 CFR Part 50 are met, and that the existing Appendix I to 10 CFR Part 50 design objectives are conformed to, and that they conform to agreements to which the NRC is a party.

The procedures submitted by the licensee will provide the staff information to ensure that each operation will meet technical specifications, will conform to the ALARA concepts of 10 CFR Parts 20 and 50, and will be within the numerical Appendix I to 10 CFR Part 50 dose design objectives. It is thus anticipated that the resulting environmental impacts and offsite doses will be insignificant and within the bounds described in the FES of 1972 for Units 1 and 2 and the Supplement to the FES of 1976 for Unit 2. Thus, the staff does not intend to prepare an environmental assessment for individual activities that it may authorize in accordance with these interim criteria.

It is recommended that the approval authority of the procedures by the NRC staff be delegated as follows:

- The Deputy Program Director, TMI-2 Cleanup, onsite will have the authority to permit weekly releases which result in offsite doses that are not greater than 5% of the annual Appendix I 10 CFR Part 50 design objectives normalized to a weekly rate (i.e. 0.05 times the annual design objective divided by 52). These permitted releases will allow the onsite TMI manager the flexibility to continue or authorize decontamination procedures while keeping releases at a small fraction of those evaluated in the FES of 1972 for Units 1 and 2 and the Supplement to the FES of 1976 for Unit 2.

The Director of the Office of Nuclear Reactor Regulation (NRR) will have the authority to permit weekly releases which result in offsite doses that are not greater than 50% of the annual Appendix I to 10 CFR Part 50 design objectives normalized to a weekly rate (i.e., 0.50 times the annual design objective divided by 52).

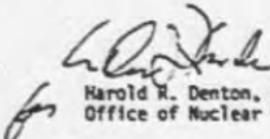
- \* Releases which may result in offsite doses in excess of those described above require approval by the Commission.

The staff has concluded that the application of the criteria proposed herein will permit the staff to authorize activities that have no significant adverse impact on public health and safety and no significant environmental impact. In view of the determination that there will be no significant environmental impact, the staff does not propose to prepare a separate Environmental Impact Statement on this action.

As noted above, any impacts that will occur under these criteria will amount to a small fraction of those described in the Final Environmental Impact Statement of 1972 and 1976. Nevertheless, recognizing the sensitivities of the local citizens to any activities at TMI, we will inform the local governmental officials of any releases before allowing them to take place. We will also notify the public through appropriate press channels. This notification activity will be done in conjunction with our established working relations with the Environmental Protection Agency. If faced with emergencies, we will, of course, find it necessary to make adjustments in these procedures. We will, however, use whatever means available to keep the public informed.

**Recommendation:** We recommend that authority be granted to the staff to approve procedures for data gathering and maintenance operations and criteria described here.

**Coordination:** The Office of the Executive Legal Director has no legal objection.

  
Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Commissioners' comments should be provided directly to the Office of the Secretary by c.o.b. Friday, April 18, 1980.

Commission Staff Office comments, if any, should be submitted to the Commissioners NLT April 11, 1980, with an information copy to the Office of the Secretary. If the paper is of such a nature that it requires additional time for analytical review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

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