

DISTRIBUTION:
Docket 50-320
NF: PDR
Local PDR
TERA
TMI PO HQ r/f
TMI Site r/f
L. Barrett
A. Fasano
R. Conte
Attorney, ELD
IE (3)
Licensing Assistant (M. Duncan)
ACRS (16)
B. Snyder
R. Weller

JUL 16 1981

HRC/TMI-81-040

Docket No. 50-320

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



Dear Mr. Hovey:

On June 17, 1981 (LL2-81-0159), you submitted for our review and approval the design criteria for the Hot Chemistry Laboratory. The Hot Chemistry Laboratory (HCL) will be used to support the recovery efforts of TMI-2. Our comments on the design criteria for the HCL are enclosed, and need satisfactory resolution prior to our approval of the design criteria.

Sincerely,

Lake H. Barrett
Acting Deputy Program Director
TMI Program Office

Enclosure: As Stated

cc: See Service Distribution List

DLB 7/14/81

OFFICE	TMI:PO <i>mt/for</i>				
SURNAME	LBarrett:js	8108030001	810716		
DATE	7/16/81	PDR ADOCK	05000320	PDR	

NRC STAFF COMMENTS ON
MET-ED'S DESIGN CRITERIA
FOR HOT CHEMISTRY LABORATORY (HCL)

1. Section 3.0 Scope

All applicable and pertinent sections in the referenced General Project Design Criteria document should be incorporated in specific HCL design criteria in order to prevent overlooking any specific design features or equipment requirements in implementation of the overall criteria.

2. Section 4.4 Fire Protection

The HCL fire detection system should directly interface with the existing fire detection system in the main control room.

3. Section 4.5 Radioactive Drainage and Section 6.12 Liquid Waste Disposal Requirements

These sections should state that drain lines from the HCL shall be provided with adequate radiation shielding to minimize personnel exposure in those areas through which those drain lines pass enroute to the Unit 2 miscellaneous waste holdup tank. In addition, the criteria should state that other applicable ALARA design features for those drain lines per Regulatory Guide 8.8 shall be incorporated (i.e., avoid sharp bends, low point dead-legs, provide flushing connections, etc.).

4. Section 6.3 Codes, Standards and Regulatory Requirements

This section should state the criteria to implement the effluent release requirements per Appendix R of the PEIS and Section 2.1. "Radioactive Discharges" of the Appendix B Technical Specifications of Operating License DPR-73. Additionally, consideration should be given to the criteria in Regulatory Guide 8.10 and Standard Review Plans (SRP chapters 3, 11, 12, 16, and 17).

5. Section 6.9 HVAC Requirements

- (a) Criteria should be established for assurance of adequate exhaust air flow from collection hoods and glove boxes. Items to take into consideration should include minimum hood face velocities, negative pressure in glove boxes and alarms if the pressure differentials are not maintained.
- (b) Positive commitments should be made to provide and test HEPA and charcoal exhaust filters. These commitments will become technical specification requirements during HCL operation.

- (c) Airborne effluents radiation monitoring criteria should be specified. The radiation monitoring requirements for effluents together with alarm and isolation functions should be established to assure that Appendix R requirements of the PEIS can be satisfied.

6. Section 6.1.6.3 Radiation Monitoring Devices

- (a) The lower limit of detection requirements should be specified for the area radiation monitors and the continuous airborne contamination monitors.
7. Based on previous discussions with your staff, additional design analysis/criteria are needed to bound the effects of the HCL on the connecting seismic structures. We believe these analysis are important, especially the load impact on the existing Emergency Steam Generator Feedwater Pump area structure. These analyses (with any change to the proposed design criteria) should be completed in order that the staff can complete their reviews.
 8. Considering the Hot Chemistry Laboratory will eventually house the Unit 2 Nuclear Sample Station, and provide the backup laboratory facilities for Unit 1 during emergency conditions, provide your basis for not routing the HCL airborne effluents through the auxiliary building and/or the stack release point.

Mr. Gale Hovey
Metropolitan Edison Company

Mr. J. J. Barton
Manager, Site Operations, TMI-2
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. E. O. Fuller
TRI-2 Licensing Supervisor
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. E. G. Wallace
P&R Licensing Manager
GPU Service Corporation
100 Interpace Parkway
Parsippany, NJ 07054

Mr. J. B. Liberman, Esquire
Berlach, Isaacs, Liberman
26 Broadway
New York, NY 10004

Mr. G. F. Troubridge, Esquire
Shaw, Pittman, Potts & Troubridge
1800 M Street, N.W.
Washington, DC 20036

Dr. Walter H. Jordan
881 W. Outer Drive
Oak Ridge, TN 37830

Dr. Linda M. Little
5000 Hermitage Drive
Raleigh, NC 27612

Earle M. Carter, Esquire
505 Executive House
P. O. Box 2357
Harrisburg, PA 17120

Honorable Mark Cohen
512 E-3 Main Capital Building
Harrisburg, PA 17120

Ellijn Weiss, Esquire
Sheldon, Harmon, Boisman & Weiss
1725 I Street, N.W., Suite 506
Washington, DC 20006

Mr. Steven E. Sholly
304 S. Market Street
Mechanicsburg, PA 17055

Mr. Thomas Garusty
Bureau of Radiation Protection
P. O. Box 2063
Harrisburg, PA 17120

Mr. Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, PA 19149

Ms. Jane Lee
R. D. 3, Box 3521
Elters, PA 17119

Walter M. Cohen, Consumer Advocate
Department of Justice
Strawberry Square, 16th Floor
Harrisburg, PA 17127

Robert L. Knupp, Esquire
Assistant Solicitor
Knupp and Andrews
P. O. Box P
407 N. Front Street
Harrisburg, PA 17108

J. In E. Minnich, Chairperson
Dauphin Co. Board of Commissioners
Dauphin County Courthouse
Front and Market Streets
Harrisburg, PA 17101

Robert Q. Pollard
Chesapeake Energy Alliance
609 Montpelier Street
Baltimore, MD 21218

Chauncey Rappford
Judith M. Johnsrud
Environmental Coalition on Nuclear Power
433 Orlando Avenue
State College, PA 16801

Ms. Terede Berrhill, Chairperson
Coalition for Nuclear Power Plant
Postponement
2610 Grendon Drive
Wilmington, DE 19808

Holly S. Iezz
Anti-Nuclear Group Representing York
745 W. Philadelphia Street
York, PA 17404

John Latta, Esquire
Pennsylvania Public Utilities Commission
P. O. Box 3265
Harrisburg, PA 17120

Jordan D. Cunningham, Esquire
Fox, Farr and Cunningham
2120 N. Second Street
Harrisburg, PA 17110

Ms. Kathy McLaughlin
Targe Wile Island Alert, Inc.
27 South 21st Street
Harrisburg, PA 17104

Ms. Marjorie M. Aamdt
R. D. 65
Castesville, PA 19320

Ms. Karen Sheldon
Sheldon, Harmon, Boisman & Weiss
1725 I Street, N.W., Suite 506
Washington, DC 20006

Earl B. Hoffman
Dauphin County Commissioner
Dauphin County Courthouse
Front and Market Street
Harrisburg, PA 17101

Government Publications Section
State of Library of Pennsylvania
Box 1601 Education Building
Harrisburg, PA 17127

Dr. Howard O. Swertz
Board of Supervisors
Londonderry Township
RFD #1 Geyers Church Road
Middletown, PA 17057

U. S. Environmental Protection Agency
Region III Office
ATTN: EIS Coordinator
Curtis Building (51st Floor)
8th and Walnut Streets
Philadelphia, PA 19106

Dauphin County Office: Emergency
Preparedness
Court House, Room 7
Front and Market Streets
Harrisburg, PA 17101

Department of Environmental Resources
ATTN: Director, Office of
Radiological Health
P. O. Box 2063
Harrisburg, PA 17105

Governor's Office of State
Planning and Development
ATTN: Coordinator, Pennsylvania
Clearinghouse
P. O. Box 1323
Harrisburg, PA 17120

Mrs. Rhoda D. Carr
1402 Merene Drive
Harrisburg, PA 17109

Mr. Richard Roberts
The Patriot
812 Market Street
Harrisburg, PA 17105

Mr. Robert B. Borsum
Rebeck & Wilcox
Nuclear Power Generation Division
Suite 420, 7735 Old Georgetown Road
Bethesda, MD 20814

Ivan M. Smith, Esquire
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Appeal Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Disabling and Service Section
U. S. Nuclear Regulatory Commission
Washington, DC 20555

William Lochstet
104 Davey Lab.
Pennsylvania State University
University Park, Pennsylvania 16802

Virginia Southard, Chairman
Citizens for a Safe Environment
768 Walton Street
Lanysme, PA 17043