

CONNECTICUT COALITION AGAINST MILLSTONE

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April 1, 2005

Paul G. Krohn
Chief Inspector
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia PA 19406-1415

Re: Millstone Nuclear Power Station

Dear Mr. Krohn:

We very much appreciate your taking the time yesterday to share your knowledge and information concerning operational and radiological aspects of the Millstone Nuclear Power Station with us during a telephone conference as a follow-up to last Tuesday's Millstone 2004 performance assessment meetings in Waterford.

We summarize the main points as follows:

1. Unit 2 Scrams

You stated that the NRC-approved Unit 2 FSAR allows for four hundred (400) "scram" (100 per cent to zero power in less than one second) events during its 40-year licensing term. You gave the FSAR reference as section 4.2.1(j) at page 4.2-2 rev. 22.

2. Strontium-90 Airborne Emission from the Millstone Stack

You stated that the discussion in Section 4.5 of the Millstone 1997 Annual Radiological Environmental Operating Report ("Table 5 in past years was used to report the measurement of Sr-89 and Sr-90 in quarterly composited air particulate filters. These measurements are not required by the Radiological Effluent Monitoring Manual (MEMM) and have been discontinued. Previous data has shown the lack of detectable station activity in this media. This fact, and the fact that milk samples are a much more sensitive indicator of fission product existence in the environment,

prompted the decision for discontinuation. In the event of widespread contamination or special events such as the Chernobyl incident, these measurements may be made.”) is misleading.

You referred to Section 2.1.1.1 of the Millstone [Nuclear] Power Station 2003 Radioactive Effluent Release Report (“Millstone Stack”) which states as follows:

2.1.1.1 Millstone Stack

The MP2 [Millstone Point Unit 2] WRGM and MP3 [Millstone Point Unit 3] SLCRS continuously monitor the effluent activity concentration and flow rate to the Millstone Stack. Monthly gaseous grab samples are taken and analyzed for isotopic content. The isotopic concentrations at the release point are multiplied by the total flow to the stack to obtain the total activity released for each isotope.

The gas washing bottle method accomplishes tritium collection. The sample is counted on a liquid scintillation detector. Concentration is multiplied by volume to get the total activity released.

Charcoal cartridges and particulate filters are used to collect iodines and particulates, respectively. These filters are then analyzed for isotopic content using a gamma spectrometer. Particulate filters are also analyzed for Sr-89, Sr-90 and gross alpha. Isotopic concentrations are multiplied by the release flow rate and sampling time to determine the total amount of activity released.

(Emphasis added.)

When we asked you to identify where measurements of Sr-90 content as released from the Millstone Stack as per Section 2.1.1.1 appear in the Millstone 2003 Radioactive Effluent Release Report, you referred us to Table 2.3-A2 (“Millstone Unit No. 3/Airborne Effluents – Mixed Continuous – Normal Ventilation & Spent Fuel Pool Evaporation”). However, Table 2.3-A2 does not identify the Millstone Stack as an airborne release pathway for Unit 3. Table 2.3-A2 does list strontium-90 as a “nuclide released.”

We note that Table 2.2-A5 (“Millstone Unit No. 2/Airborne Effluents – Elevated – Containment Vents/Site Stack”) is the only table appearing in the 2003 Report which identifies the “Site Stack” as an airborne release

pathway for Unit 2. It does not, however, list strontium-90 as a "nuclide released." (Other nuclides are listed as "nuclides released" even if no detectable levels were noted.)

As you recall, we concluded our conversation with the understanding that you would endeavor to continue to find an answer to our query, as articulated at the assessment meeting.

Again, the simple substance of that query is this:

What levels of strontium-90 were released from the Millstone Stack in 2003?

We appreciate your providing all appropriate documentation of whatever measurements were taken and analysis conducted.

Thank you for your continuing attention to this request.

Sincerely,

Nancy Burton

Please respond to:
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