

NRR-PMDAPEm Resource

From: Wiebe, Joel
Sent: Monday, January 30, 2012 2:44 PM
To: Mitchel Mathews
Subject: Request for Partial Site Release for Clinton Power Station: Non-acceptance with Opportunity to Supplement
Attachments: image001.jpg

By letter dated November 18, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11340A077), Exelon Generation Company, LLC (Exelon), submitted a request for partial site release for Clinton Power Station, Unit 1 (CPS).

We have determined that additional information is necessary to commence our review. Inform me of your availability to participate in a teleconference within 5 days of this communication.

The purpose of the teleconference is to ensure the scope of the required information is understood and to determine if the information can be submitted within the required supplement schedule (not greater than 13 working days).

Additional information required:

1. 10 CFR Part 50.83(c)(2) requires a determination whether the licensee's classification of any release areas as non-impacted is adequately justified. The staff determined that the following items are not adequately justified:
 - a. Exelon's November 18, 2011, submittal states that the shallow groundwater flow is "predominately toward the lake." The land to be released is toward the lake (from the perspective of site structures), but is on the opposite side of the lake. The submittal does not address any potential, deeper groundwater aquifers nor whether those aquifers (if they exist) could impact the land to be sold.

Additionally, the submittal states "Station release pathways are monitored and summarized as follows... Surface water, drinking, and well water samples were analyzed.... No tritium activity has been detected." A review of the CPS 2010 Annual Radiological Environmental Operating Report (AREOR) indicates the following:

"Background levels of tritium were detected at concentrations greater than the self-imposed LLD of 200 pCi/L in three of 17 groundwater monitoring locations. The tritium concentrations ranged from 184 +104 pCi/L to 744 ± 130 pCi/L."

The CPS 2010 AREOR indicates tritium is localized around three groundwater wells. The NRC finds the highest levels of tritium limited to one groundwater well, MW-CL-21S, and that the results are consistently and significantly higher than other wells in the area. Two other wells very near MW-CL-21S show lower levels of tritium. All other monitoring wells in the 2010 AREOR indicated tritium was not detected. The licensee characterizes this tritium as "background levels."

Provide justification that demonstrates that the areas to be released are not impacted by any potential deep aquifers, including providing information regarding any relationship between shallow and potentially deep aquifers and the background levels of tritium in the vicinity of the areas to be released.

- b. Exelon's November 18, 2011, submittal states that "Station release pathways are monitored and summarized as follows... Grass samples were analyzed for concentrations of gamma emitting

nuclides. Concentrations of Cosmogenic Be-7 and naturally occurring K-40 were consistent with those detected in previous years. No fission or activation products were detected.”

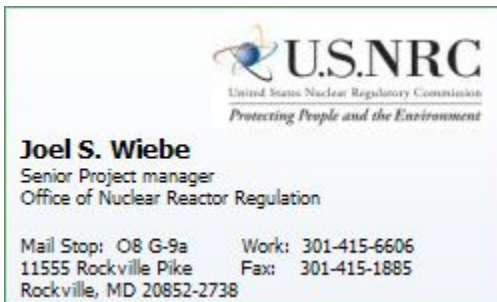
Provide the approximate percentage of samples that were taken in the areas proposed to be released. Provide justification that this adequately confirms that the areas can be classified as non-impacted.

2. 10 CFR Part 50.83(a) states, in part, “Section 50.75 specifies recordkeeping requirements associated with partial release.” Exelon’s submittal does not address 10 CFR Part 50.75 recordkeeping requirements.

Discuss how 10 CFR Part 50.75 recordkeeping requirements will be met.

3. Exelon’s November 18, 2011, submittal states that the transfer of this land does not have any effect on the Early Site Permit study conducted in 2002, on an area that is contained entirely within the CPS exclusion area. 10 CFR Part 52.39(e) states, in part, “The holder of an early site permit may not make changes to the early site permit, including the site safety analysis report, without prior Commission approval.”

Provide a specific reference to the issued Early Site Permit and the docketed site safety analysis report. Provide a reference to sections of the early site permit, including the site safety analysis report, that are potentially impacted by the proposed partial release and demonstrate why this is not considered a change.



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Mail Envelope Properties (Joel.Wiebe@nrc.gov20120130144400)

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with Opportunity to Supplement
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From: Wiebe, Joel

Created By: Joel.Wiebe@nrc.gov

Recipients:
"Mitchel Mathews" <Mitchel.Mathews@exeloncorp.com>
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Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
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