

**NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)**

CONTROL NO: **3803**
FILE: **ENVIRO**

FROM: Carolina Power & Light Raleigh, NU J A Jones		DATE OF DOC 4-3-75	DATE REC'D 4-8-75	LTR XXXX	TWX	RPT	OTHER
TO: Mr Case		ORIG one signed	CC	OTHER	SENT AEC PDR <u>XX</u> SENT LOCAL PDR <u>XX</u>		
CLASS	UNCLASS XXXXXXXXXX	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-261		

DESCRIPTION:

Ltr re theri 10-23-73 submittal...trans the following:

DIST PER LPM DITTMAN

PLANT NAME: H B Robinson #2

ENCLOSURES:

Proposed change to Enviro Tech Specs:
Consisting of info concerning radioactive effluents & documents reflecting the EPA authroity.....(20 cys encl rec'd)

FOR ACTION/INFORMATION 4-10-75 ehf

BUTLER (L) W/ Copies	SCHWENCER (L) W/ Copies	ZIEMANN (L) W/ Copies	REGAN (E) W/ Copies
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INTERNAL DISTRIBUTION

<u>REG FILE</u> NRC PDR OGC, ROOM P-506A GOSSICK/STAFF CASE GIAMBUSSO BOYD MOORE (L) DEYOUNG (L) SKOVHOLT (L) GOLLER (L) (Ltr) P. COLLINS DENISE REG OPR FILE & REGION (2) T.R. WILSON STEELE	<u>TECH REVIEW</u> SCHROEDER MACCARY KNIGHT PAWLICKI SHAO STELLO HOUSTON NOVAK ROSS IPPOLITO TEDESCO LONG LAINAS BENAROYA VOLLMER	<u>DENTON</u> GRIMES GAMMILL KASTNER BALLARD SPANGLER <u>ENVIRO</u> MULLER DICKER KNIGHTON YOUNGBLOOD REGAN PROJECT LDR Dittman HARLESS	<u>LIC ASST</u> R. DIGGS (L) H. GEARIN (L) E. GOULBOURNE (L) P. KREUTZER (E) J. LEE (L) M. MAIGRET (L) S. REED (E) M. SERVICE (L) S. SHEPPARD (L) M. SLATER (E) H. SMITH (L) S. TEETS (L) G. WILLIAMS (E) V. WILSON (L) R. INGRAM (L) m. DUNCAN	<u>A/T IND</u> BRAITMAN SALTZMAN MELTZ <u>PLANS</u> MCDONALD CHAPMAN DUBE (Ltr) E. COUPE PETERSON HARTFIELD (2) KLECKER EISENHUT WIGGINTON
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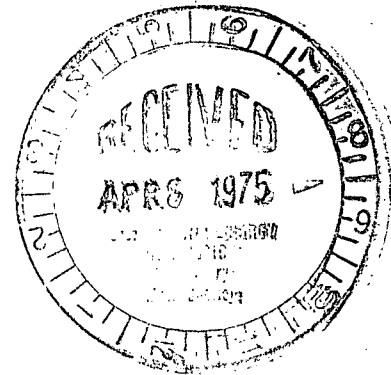
EXTERNAL DISTRIBUTION

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1 - Newton Anderson		1 - J. D. RUNKLES, Rm E-201 GT
- ACRS HOLDING/SENT		



Carolina Power & Light Company

April 3, 1975



Mr. Edson G. Case, Acting Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

RE: H. B. ROBINSON UNIT NO. 2
Docket No. 50-261

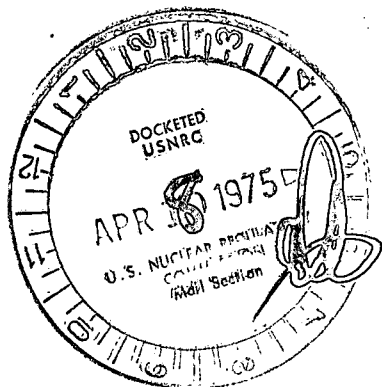
Dear Mr. Case:

Carolina Power & Light Company is herewith transmitting twenty (20) copies of proposed Environmental Technical Specifications for the H. B. Robinson Steam Electric Plant, Unit No. 2. These proposed Environmental Technical Specifications reflect comments received from the regulatory staff on our previous submittal of October 23, 1973, and during the ensuing one and one-half years during which the Environmental Technical Specifications have been developed. In addition, this submittal reflects the regulatory authority of the U. S. Environmental Protection Agency pursuant to the Federal Water Pollution Control Act Amendments of 1972 (P. L. 92-500).

The proposed Environmental Technical Specifications are offered herein to be as consistent as possible with the NRC's historical interest in effluent limits and our primary obligations to EPA as set forth in the NPDES permit.

As requested by the NRC staff, the Company has incorporated radioactive releases and radiological monitoring specifications into the Environmental Technical Specifications. However, this will result in duplicative specifications in Appendix A, Technical Specifications, and Appendix B, Environmental Technical Specifications. In order to avoid this situation, the Company requests that the Commission delete Section 3.9, Radioactive Effluents, and Section 4.10, Surveillance Requirements from Appendix A, Technical Specifications concurrent with issuance of the Environmental Technical Specifications.

The Company is also transmitting at this time our comments regarding guidance provided by the regulatory staff for radioactive releases consistent with proposed Appendix I to 10 CFR 50. If it is NRC policy that specifications consistent with Appendix I be developed prior to adoption of Appendix I, we request the opportunity to discuss the guidance given for radioactive



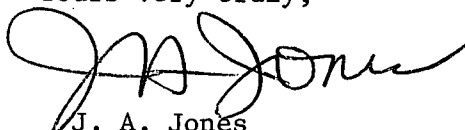
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April 3, 1975

releases. However, we would request that issuance of applicable portions of the Environmental Technical Specifications not be delayed due to any lack of resolution concerning release limits for which there are no provisions for implementation.

The Company will be glad to discuss our proposed Environmental Technical Specifications with the NRC staff.

Yours very truly,

A handwritten signature in dark ink, appearing to read "J. A. Jones", written in a cursive style.

J. A. Jones
Executive Vice President
Engineering, Construction & Operation

JAJ/jf