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 ACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397  
 AUTH. NAME: SORENSEN, G.C. AUTHOR AFFILIATION: Washington Public Power Supply System  
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk) 92-35

SUBJECT: Informs that 50.75(g) provides more appropriate method for identifying, controlling & recording low-level residual activity from plant operations.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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April 13, 1993  
G02-93-086

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NO. NPF-21**  
**NRC INSPECTION REPORT 92-35**  
**RESIDUAL LOW-LEVEL RADIOACTIVE MATERIALS**

- References:
- 1) Letter (No. GI2-92-277) dated November 23, 1992, JH Reese (NRC) to Supply System, "NRC Inspection Report 50-397/92-35"
  - 2) Letter (No. GO2-92-271) dated December 23, 1992, JV Parrish (SS) to NRC, "NRC Inspection Report 92-35, Response to Notice of Violation"
  - 3) Letter (No. GI2-93-001) dated December 28, 1992, RA Scarano (NRC) to Supply System, "NRC Inspection Report 50-397/92-41"

Inspection Report 92-35 (Reference 1) identified weaknesses in the control of radioactive liquids released to the WNP-2 stormwater drainage pond. In Reference 2 the Supply System committed to several measures which, based on monitoring data, have been successful in eliminating the discharge of gamma-emitting radionuclides which are of WNP-2 origin. As noted in Reference 2, we anticipated that control of tritium would be a more vexing problem primarily due to moisture from the turbine building condensing on plant roofs and walls. To assist us in assessing issues related to the release of low-level radioactive materials we committed to retaining an independent consultant. That assessment is in progress. We also committed (Reference 2, Appendix A, Page 4) to pursuing, by April 15, 1993, Federal or State applications, as appropriate, for continued releases of tritium to the WNP-2 stormwater drainage pond.

With input from our consultant, we have concluded that the appropriate regulatory instrument for addressing low-level contamination in the stormwater drainage pond is 10CFR50.75(g). We will finalize our plans following submittal of the consultant's assessment and recommendations.

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## RESIDUAL LOW-LEVEL RADIOACTIVE MATERIALS

Consistent with the regulation, residual contamination will be appropriately identified, documented, and controlled. We judge that this approach is applicable to the future instances in which tritium is detected in the stormwater drainage system. We intend that our §50.75(g) program be structured such that it encompass residual low-level radioactive materials identified onsite. An example, cited in Reference 3, is the identification of low-level radioactive materials in the sediments from cleaning of the WNP-2 cooling towers.

We had previously indicated to NRC staff that we would likely prepare one or more requests for approval of alternative disposal (per 10CFR20.302(a)) of materials with residual low-level radioactive material. The purpose of this letter is to inform you of the approach we are now pursuing. We believe that the §50.75(g) provides a more appropriate method for identifying, controlling, and recording low-level residual activity from plant operations than does the provision of §20.302(a) for alternative disposal. If you have questions regarding this approach please call me at (509)377-4027.

Very truly yours,



G.C. Sorensen, Manager  
Regulatory Programs (PE-20)

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