

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8102100304 DOC.DATE: 81/02/06 NOTARIZED: NO DOCKET #  
 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH.NAME AUTHOR AFFILIATION  
 VILLFORTH,J.C. HHS, Dept. of, US Public Health Service  
 RECIP.NAME RECIPIENT AFFILIATION  
 VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Comments on NUREG-0843,draft EIS re steam generator repair  
 at facilities. Environ consequences from gaseous & liquid  
 releases from site during repair have been adequately  
 assessed re population dose.

DISTRIBUTION CODE: C002S COPIES RECEIVED:LTR 1 ENCL 0 SIZE:2  
 TITLE: Environ. Comments.

NOTES:

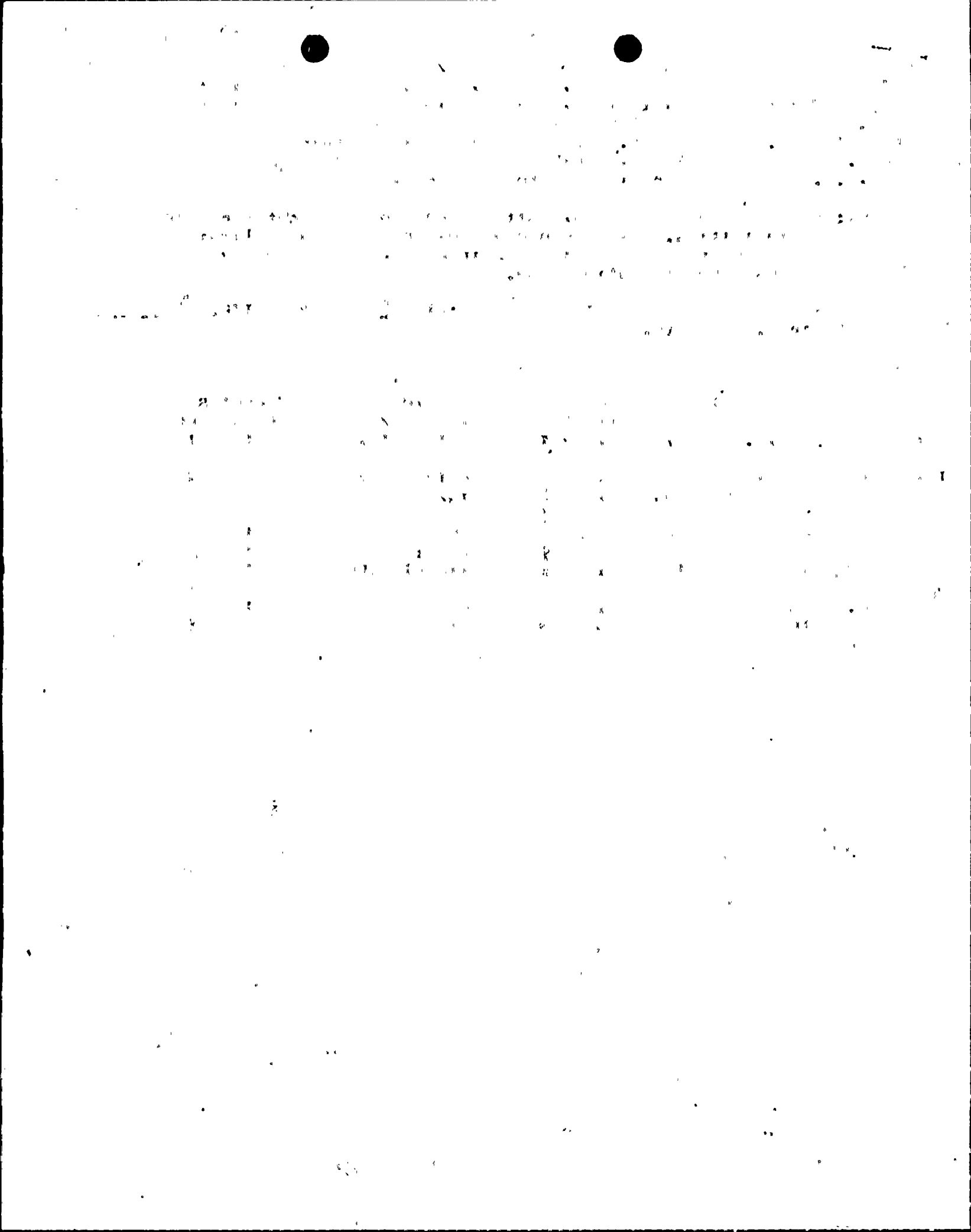
	RECIPIENT ID CODE/NAME		COPIES LTTR ENCL		RECIPIENT ID CODE/NAME		COPIES LTTR ENCL
ACTION:	VARGA,S.	17	7		GROTHENHUIS,M 05		1
INTERNAL:	ACCIDENT EVAL BR		1		EF TREAT SYS BR		1
	ENV ENG BR	09	1		HYD/GEO BR		1
	HYDRO-GEO BR		1		I&E	07	2
	NRC PDR	02	1		OELO		1
	RAD ASSESSMT BR		1		<u>REG-FILE</u>	01	1
	SIT ANAL BR	10	1		UTIL-FINANCE BR		1
EXTERNAL:	ACRS		1		LPDR	03	1
	NATL LAB	20	5		NSIC	04	1

FEB 12 1981

17

TOTAL NUMBER OF COPIES REQUIRED: LTTR 29 ENCL

21





## DEPARTMENT OF HEALTH &amp; HUMAN SERVICES

Public Health Service

Food and Drug Administration  
Rockville MD 20857

FEB 6 1981

DISTRIBUTION  
SERVICES UNIT

FEB 9 PM 2 00

US NRC  
DISTRIBUTION SERVICES  
BRANCH

Mr. Steven A. Varga, Chief  
Operating Reactors Branch #1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Varga:

The Draft Environmental Statement, NUREG-0843 related to steam generator repair at Turkey Point Plant, Units 3 and 4, December 1980, has been reviewed by the Bureau of Radiological Health, FDA. We have the following comments to offer.

1. Our assignment of the proposed repair method for the three steam generators per unit indicates the occupational collective whole body dose estimates are based on accepted practices, and provides assurance that such doses will be as low as reasonably achievable (ALARA). The use of dose reduction measures such as local decontamination, temporary lead shielding, pre-job training and use of remote tools as discussed in paragraph 1, page 4-3, are essential to maintaining the occupational doses ALARA. Recent reports prepared by the Atomic Industrial Forum support the use of such measures to reduce occupational doses.
2. The environmental consequences from gaseous and liquid releases of radioactivity from the plant site during steam generator repair have been adequately assessed in terms of population dose.
3. The statement does not contain any specific information on emergency planning and coordination with the State of Florida. It is believed that Section 4.4, Environmental Impact of Postulated Accidents, should be expanded to include a statement that coordination with the State will be completed in view of the concern of the public and State agencies regarding exposure to low levels of radiation.
4. The long term storage of the degraded steam generators on site appears to offer the best ultimate disposal method from a radiological viewpoint should a suitable radioactive waste disposal site not be available.

C002  
5/10

P

8102100304

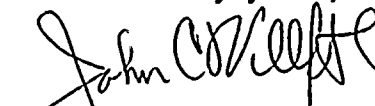


Mr. Steven A. Varga - Page 2

5. Section 4.1.2, Public Radiation Exposure, provides estimates of the impacts on the public from the proposed steam generator repair. Estimates of dose are provided for radioactive effluent releases, impacts from solid wastes and from on site storage of the steam generators. If feasible, we believe a special effort should be made to measure the individual and population dose in the off site environment to verify that the actual doses are within an acceptable range of those estimated by the FPL as shown on page 45-11, Table 4.5, Radioactive Effluents from Steam Generator Repair and Normal Operations. It is noted in this table that measured values for the radioactive effluents have been reported for the steam generator repair of Surrey Unit 2 reactor. It would be helpful if a section were added to this statement that briefly discusses the FPL environmental monitoring program as it would relate to this project.

Thank you for the opportunity to review and comment on this draft document.

Sincerely yours,



John C. Villforth  
Director  
Bureau of Radiological Health

