



Docket No. 50-346
License No. NTF-3
Serial No. 551

LOWELL E. ROE
Vice President
Facilities Development
(419) 259-5242

November 2, 1979

Director of Nuclear Reactor Regulation
Attention: Mr. William P. Gammill, Acting Assistant
Director for Operating Reactor Projects
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Implementation of 40 CFR Part 190

Dear Mr. Gammill:

In your letter of September 17, 1979 addressed to All Power Reactor Licensees, the Licensees were requested to describe how they will implement the requirements of the EPA Uranium Fuel Cycle Standard, 40 CFR Part 190, until such time as the NRC Staff completes their review of the 10 CFR Part 50, Appendix I, submittal for Davis-Besse Nuclear Power Station Unit 1, and issues revised Technical Specifications. The Toledo Edison Company submitted this material for NRC Staff review on March 16, 1979 (Serial No. 488) and May 18, 1979 (Serial No. 504).

Beginning December 1, 1979, and continuing until Technical Specification changes which implement 10 CFR Part 50, Appendix I are issued, we will take the following actions:

1. With the submittal of each Semiannual Radioactive Effluent Report, offsite doses due to radioactive liquid and gaseous effluents will be provided and compared to the Appendix I design objectives.
2. If the Appendix I design objective annual doses are exceeded during any quarter for liquids or gases, or if twice the design objective annual doses are exceeded for the calendar year, a special report will be submitted to the NRC. This

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report will contain a calculation of the highest radiation exposure to any member of the general public from all effluent pathways from Davis-Besse.

If you have any questions concerning our interim method of complying with 40 CFR Part 190, please contact us.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Lowell E. Roe".

Lowell E. Roe
Vice President
Facilities Development

cc: J.G. Keppler, Region III, NRC
R. Reid, Division of Operating Reactors, NRC

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