



Omaha Public Power District

1623 HARNEY : OMAHA, NEBRASKA 68102 : TELEPHONE 536-4000 AREA CODE 402

October 30, 1979

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert W. Reid, Chief
Operating Reactors Branch No. 4
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Reference: Docket No. 50-285

Gentlemen:

The Omaha Public Power District received a letter from the Commission dated September 17, 1979, requesting that the District provide a method of demonstrating compliance with 40 CFR Part 190. Accordingly, the following information is provided.

In June of 1976, the design of Radwaste Processing System for Fort Calhoun Station Unit No. 1 was evaluated in accordance with the dose design objectives of Appendix I to 10 CFR Part 50. It was determined that during normal reactor operation, including anticipated operational occurrences, the doses to individuals were well below the design objectives set forth in Section II of Appendix I. This evaluation, along with other related data, was submitted to the Commission under a report entitled "Evaluation of Fort Calhoun Station Unit No. 1 in Accordance With 10 CFR Part 50, Appendix I". This report consisted of, among other things:

1. Information to evaluate the means employed for keeping levels of radioactivity in effluents to unrestricted areas as low as is reasonably achievable, including all such information as is required by Section 50.34(a), (b), and (c) of 10 CFR Part 50 not already contained in the original application for a construction permit.
2. Proposed Technical Specifications (also submitted to the Commission under an Application for Amendment of Operating License on March 21, 1978) developed for the purpose of keeping releases of radioactive materials to unrestricted areas during normal reactor operation, including expected operational occurrences, as low as is reasonably achievable.

Later, in March of 1979, the District submitted revised Technical Specifications in accordance with the provisions of NUREG-0472 and in response to a letter from the Commission dated July 11, 1978.

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Director of Nuclear Reactor Regulation
October 30, 1979
Page Two

The above-referenced information, which demonstrates compliance with 10 CFR Part 50, Appendix I, dose design objectives, also conservatively demonstrates compliance with 40 CFR Part 190. This is because the Fort Calhoun Station is the only significant dose contributor to the population within the station's general vicinity. Accordingly, we believe that based upon the results of Fort Calhoun Station's evaluation in accordance with Appendix I to 10 CFR Part 50, current operating philosophy in accordance with ALARA and existing applicable Technical Specifications reasonable assurance is provided for complying with 40 CFR Part 190.

Sincerely,

W. C. Jones
Division Manager
Production Operations

WCJ/KJM/BJH:jmm

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N. W.
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