

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

(215) 841-5001

November 1, 1979

Mr. William P. Gammill  
Acting Assistant  
Director for Operating Reactor Projects  
Division of Operating Reactors  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Gammill:

This letter is in response to your letter of September 17, 1979, requesting a description of the manner in which we plan to demonstrate conformance with the provisions of 40 CFR Part 190 by December 1, 1979.

Pending approval of our proposed Radioactive Effluent Technical Specification (RETS) amendment submitted on March 1, 1979, we plan to satisfy 40 CFR Part 190 at Peach Bottom Atomic Power Station by December 1, 1979, by:

1. For liquid effluents, adopting specifications 3.8.D and 4.8.D of our March 1, 1979, RETS amendment submittal. In order to comply with specifications 3.8.D and 4.8.D, we will apply the following to the extent needed:
  - a) Proposed specification 3.8.B.2 and 4.8.B.2
  - b) Proposed "Off-Site Dose Calculation Manual" - Section III, Liquid Pathway Dose Calculations.
2. For gaseous effluents, adopting specifications 3.8.D and 4.8.D of our March 1, 1979, RETS amendment submittal. In order to comply with specifications 3.8.D and 4.8.D, we will apply the following to the extent needed:

1292 223

A009  
S/P

7911070 440

- a) Proposed specifications 3.8.C.2, 4.8.C.2, 3.8.C.3 and 4.8.C.3.
  - b) Proposed "Off-Site Dos Calculation Manual" - Sections IV B and IV C, Gaseous Pathway Dose Calculations.
3. Performing sampling and activity analysis in accordance with our present Technical Specification requirements.

We believe that this program demonstrates our conformance with the provisions of 40 CFR Part 190. Should you have any questions in this regard, please feel free to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to be 'A. Gammill', is written over the typed name 'A. Gammill'.

1292 224