

BOSTON EDISON COMPANY
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G. CARL ANDRONINI
SUPERINTENDENT
NUCLEAR OPERATIONS DEPARTMENT

November 8, 1979

BECO. Ltr. #79-232

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

License No. DPR-35
Docket No. 50-293

Dear Sir:

Your letter dated September 27, 1979, stated that our proposed Radiological Effluent Technical Specification (RETS) would not be processed prior to the December 1, 1979 effective date for implementation of the EPA Uranium Fuel Cycle Standard, 40 CFR Part 190, and as a result you requested that Boston Edison Company propose an alternate method of demonstrating compliance with 40 CFR Part 190 until such time as our proposed RETS' are issued by the Commission.

Therefore, pursuant to your request Boston Edison Company hereby commits to comply with Specification 3.8.L of the proposed RETS as submitted on February 21, 1979 in BECO. Ltr. #79-45 from Mr. J. E. Howard to Mr. T. A. Ippolito as an alternative method of demonstrating compliance with 40 CFR Part 190. Specifically, this is a commitment to limit doses to twice the values specified in Section 3.8.C.1.a, 3.8.F.1.a, 3.8.G.1.a and 3.8.G.1.b of the BECO. submittal. Should the dose limits in these specifications be exceeded by a factor of two, Boston Edison Company will prepare and submit the "Special Report" as referenced in Specification 6.9.B.2 provided that the Commission has issued guidance which identifies an analytical method which is acceptable to the staff for demonstrating compliance with 40 CFR 190. If such guidance is not issued prior to the need for the "Special Report", Boston Edison Company will submit the "Special Report" within 90 days of the date on which the NRC issues such guidance.

We trust this method of demonstrating compliance with 40 CFR 190 is acceptable to you. Should you require any additional information, please contact us at your convenience.

Very truly yours,

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