

P.O. BOX 270  
HARTFORD, CONNECTICUT 06101  
(203) 666-6911

May 21, 1979

Docket No. 50-336

Director of Nuclear Reactor Regulation  
Attn: Mr. R. Reid, Chief  
Operating Reactors Branch #4  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

References: (1) J. F. Opeka letter to B. H. Grier dated March 29, 1979.  
(2) W. G. Council letter to D. L. Ziemann and R. Reid dated March 13, 1979.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2  
Aerated Liquid Radwaste Evaporator

In Reference (1), Northeast Nuclear Energy Company (NNECO) forwarded Licensee Event Report 79-06/04T-0, submitted pursuant to Millstone Unit No. 2 Appendix B Environmental Technical Specifications. Specification 2.4.1.2.B requires that the equipment installed in the liquid radwaste processing system be maintained and operated to process liquid radwaste prior to discharge when the projected cumulative release could exceed 1.25 Ci/reactor/calendar quarter, excluding tritium and dissolved gases. The aerated liquid streams are designed to be processed either through the evaporator or the mixed bed demineralizer and filters. The 10CFR50 Appendix I analyses (dated December 15, 1976) of the radwaste operations indicated that treatment of aerated wastes with either the evaporator or the demineralizer would result in effluents whose offsite consequences were well within the applicable limits. This provided the plant with operational flexibility and redundant backup aerated radwaste equipment. Due to corrosion problems, the radwaste evaporator has been out of service since the third quarter of 1978 and the demineralizer and filter system has been utilized. Thus, at all times, adequate aerated radwaste treatment systems were maintained and operated to keep effluents within the applicable specifications and limits.

The need for repairing or replacing the aerated radwaste evaporator has been investigated, and it has been concluded that this is unnecessary based upon the following considerations:

- (1) Projected discharges continue to remain well below the 10 Ci limit of Specification 2.4.1.2.E.
- (2) The ALARA philosophy continues to be maintained through the use of the redundant radwaste system prefilter, demineralizer, and post filter which

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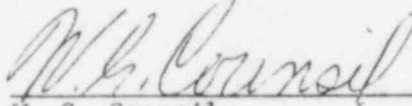
have been and will continue to be utilized in place of the non-operative waste evaporator.

- (3) The NRC 10CFR50, Appendix I specifications, as amended by Reference (2), change the methodology for evaluating/reporting radiological effluents. Limits will be based on radiation doses received external to the plant, rather than on quantity of radioactivity discharged. Evaluation by NNECO has estimated that Millstone Unit No. 2 will remain far below allowable limits without an evaporator installed. Other installed equipment will continue to be utilized as stated in Item (2) above.
- (4) Degradation of the evaporator has been sufficiently extensive to preclude repair of the existing unit; replacement utilizing the existing location is not practical. A conservative cost-benefit analysis based upon current criteria clearly demonstrates that evaporator replacement cannot be justified from an ALARA-dose reduction standpoint.

In summary, NNECO has determined that replacement of the aerated liquid radwaste evaporator is not warranted based upon discharge criteria, actual plant releases, and ALARA considerations. Deletion of the non-operative evaporator does not degrade the overall installed/operating capability to process aerated liquid radwaste because the functional prefilter, demineralizer, and post filter components will maintain acceptable discharge limits. Reporting pursuant to Environmental Technical Specification 2.4.1.2.B is not necessary as the evaporator is not an exclusive means of processing aerated liquid wastes. We trust you find the above information sufficient for you to understand our position.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
W. G. Council  
Vice President

cc: B. H. Grier  
Director, Region I  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
King of Prussia, PA 19406