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Minnesota Pollution Control Agency

SEP 12 1977

Mr. Victor Stello, Director
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Stello:

We are in receipt of a license amendment request dated August 9, 1977 from the Northern States Power Company that would modify the Monticello (Docket 50-263 License DPR-22) Radiation Environmental Monitoring Program by removing clam sampling and analysis.

I would agree that Mississippi River conditions in the vicinity of the Monticello plant are not conducive to efficient clam sampling. However, I would suggest that the Northern States Power clam sampling techniques and their vigor in discovery of clam beds might also contribute to the lack of success in clam sampling.

Since clams are an efficient water filter, I would prefer that clams not be dropped from the monitoring program until all alternatives that might improve clam sampling efficacy have been explored. A few methods to improve efficacy come immediately to mind: sampling during times when the clam population is optimally largest, search and discovery of the best clam beds, utilization of submerged clam traps, implantation and containment in suitable trap-like containers of clams at desirable locations relative to the plant outfall and intake. I am sure these suggestions do not exhaust all possibilities.

Would you let me know whether the Nuclear Regulatory Commission intends to investigate clam sampling alternatives or other means by which clam monitoring can be improved.

Sincerely,

Sandra S. Gardening
Sandra S. Gardening
Executive Director

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