

JUN 25 1985

Docket No. 50-458

Mr. William J. Cahill, Jr.
Senior Vice President
River Bend Nuclear Group
Gulf States Utilities Company
P.O. Box 2951
Beaumont, Texas 77704

Attention Mr. J. E. Booker

Dear Mr. Cahill:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - OFFSITE DOSE CALCULATION MANUAL
FOR RIVER BEND

As a part of the NRC Staff's review of your application for an operating license for River Bend Station, the staff has determined the need for additional information in the area of the Offsite Dose Calculation Manual (ODCM) for River Bend.

The staff has completed their review of the draft ODCM submitted in a letter from J. Booker to H. Denton dated May 31, 1985. Staff comments on the ODCM are Enclosure 1.

Please submit for final review, a revised ODCM that resolves the comments in Enclosure 1.

Sincerely,

Walter R. Butler
Licensing Branch No. 2
Division of Licensing

Enclosure: As stated

cc w/enclosure:
See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Sincerely,

A handwritten signature in cursive script, reading "Walter R. Butler".

Walter R. Butler
Licensing Branch No. 2
Division of Licensing

Enclosure: As stated

cc w/enclosure:
See next page

Mr. William J. Cahill, Jr.
Gulf States Utilities Company

River Bend Nuclear Plant

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COMMENTS ON THE PROPOSED
OFFSITE DOSE CALCULATION MANUAL
FOR RIVER BEND STATION, REV. 1
DTD 4/25/85

1. Appendix "B, Table B-2

The calculational assumptions for computing A_{i2} are listed at the end of Table B-2, and a reference is given to Table 5.4-3 of the ER for BF_i values for the principal nuclides (e.g., I, Cs, Co). However, Table 5.4-3 merely lists the site specific values used in the dose calculations in the ER, and does not provide the bases for the values. The differences between the ER values and the Reg. Guide 1.109 values (Table A-1) are substantial for some nuclides. The ER values followed by the Reg. Guide values in parentheses for several elements follow: Cs, fish 16 (2000), invertebrates 16 (1000); Co, fish 16(50), invertebrates 18(200); Zn fish 170 (2000), invertebrates 170 (10,000). Provide the bases for the values in ER Table 5.4-3, or adopt the Reg Guide values.

2. Gaseous Effluent Methodology

(a) On p. 3-2 it is stated that the X/Q values used in eqs. 3.3.1.2.1-1 and 3.3.1.2.1-2 will be taken from Appendix E, whereas p. 3-3 indicates the values will be taken from App. F. In addition, it is not clear why the X/Q value for evaluating the gamma air dose in Table F-1 is less than the highest value in Table E-1. Resolve these apparent inconsistencies.

(b) On p. 3-7, it is stated that the X/Q values used in eq. 3.3.2.2-1 will be taken from App. F. The X/Q values listed in Table F-1 for evaluating doses for compliance with TS 3.11.2.1 are less than the highest values listed in Table E-1 for the site boundary. TS 3.11.2.1 states that "The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the site boundary shall be limited to ..." Consequently, the highest X/Q values listed in Table E-1 for the site boundary should be used in eq. 3.3.2.2-1 or a bases should be given for using the values in Table F-1.

3. Appendix G

The P_i values in Table G-1 are in error. They do not agree with the R_i values for inhalation listed in Table I-4. For example, compare the P_i values for an infant for Sr-90, bone; I-131, thyroid, and Cs-137, T. Body with the corresponding values in Table I-4. Check the values in Table G-1.

4. Appendix I

The R_i values for some pathways (e.g., Table I-6, cow milk, goat milk, and meat) and some nuclides (e.g., H-3, I-131, Mn-54) are different than the values calculated by the staff. Apparently, site specific values have been used in calculating the R_i values. List the site specific values, and provide the bases for the values (or a reference that provides the bases) that are different than those used in Reg. Guide 1.109.