

SEP 23 1974

D. R. Muller, Assistant Director for Environmental Projects, L  
ENVIRONMENTAL TECHNICAL SPECIFICATIONS - YANKEE ROWE

We receive, from time to time, recommendations from our Regional Offices concerning the upgrading of requirements in specific plant technical specifications. These recommendations are frequently based on a comparison with Regulatory Guides and the type of requirements being incorporated into technical specifications for new facilities. We have been forwarding pertinent comments to Project Managers within your organizations when a Project Manager for that particular facility has been assigned. However, in the case of Yankee Rowe a Project Manager has not been assigned, therefore, we are forwarding our comments to you.

We recognize that there is no licensing action pending for Yankee Rowe and, therefore, changes and additions to the technical specifications cannot be accomplished in the near future. We request, however, that our comments be retained on file until such time as they may be considered for incorporation into new or revised technical specifications for Yankee Rowe.

Specific comments are as follows:

1. The licensee's meteorology program is not consistent with Regulatory Guide 1.23 recommendations. Of particular concern is the fact that wind speed and direction are measured at the 30 foot level while most airborne releases from the plant are at the 140 foot level.
2. There are no technical specifications for a non-radiological monitoring program.
3. There are several inconsistencies between the proposed technical specifications and the FSAR concerning how airborne iodine is to be analyzed.

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4. The required frequency for gross alpha analyses is based on when alpha activity is present in the release. It has been noted that the wording of this requirement leads to confusion between the licensee and the contractor (for environmental sample analyses) as to what is required.

If you have questions concerning these comments or should desire additional information, please contact L. Cunningham, extension 7413.

Carl W. Kuhlman, Assistant Director  
for Radiological, Environmental  
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