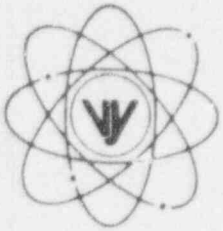


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE
580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

August 2, 1996
BVY 96-93

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- References:
- (a) License No. DPR-28 (Docket No. 50-271)
 - (b) Letter, USNRC to VYNPC, "Approval Under 10 CFR 20.302(a) of Procedures for Disposal of Slightly Contaminated Septic Waste On Site at Vermont Yankee (TAC NO. 73776), NVY 89-189, dated August 30, 1989
 - (c) Letter, VYNPC to USNRC, "Request to Amend Previous Approval Granted Under 10 CFR 20.302(a) for Disposal of Contaminated Septic Waste," BVY 95-97, dated August 30, 1995
 - (d) Letter, USNRC to VYNPC, "Approval Pursuant to 10 CFR 20.2002 For Onsite Disposal of Cooling Tower Silt - Vermont Yankee Nuclear Power Station (TAC NO. M93420), NVY 96-39, March 4, 1996
 - (e) Telecon, VYNPC to USNRC, dated June 28, 1996

Subject: Request for Correction of NRC Safety Evaluation Regarding Onsite Disposal of Cooling Tower Silt at Vermont Yankee Nuclear Power Station

The purpose of this letter is to request a revision of the NRC safety evaluation accompanying Reference (d).

In Reference (b) the NRC approved the on-site disposal of slightly contaminated septic waste at Vermont Yankee Nuclear Power Station. In Reference (c), Vermont Yankee requested an amendment of the previously granted approval of Reference (b) to include disposal of slightly contaminated cooling tower silt material. As described in Reference (c), the proposed silt disposal method is the same as the septic waste disposal method approved in Reference (b) and utilizes the same spreading areas designated for spreading septic waste. The radiological assessment accompanying Reference (c) demonstrates that the dose impact from the disposal of cooling tower silt during normal maintenance will not exceed the dose limits already imposed for septic waste disposal.

In Reference (d), the NRC approved the on-site disposal of cooling tower silt at Vermont Yankee Nuclear Power Station subject to four boundary conditions. In reviewing the NRC safety

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evaluation accompanying Reference (d) two discrepancies were identified. These discrepancies were discussed with Messrs. D. Dorman and J. Minns of your staff in Reference (e).

The first discrepancy involves the first boundary condition of Reference (d) which states: "The annual disposal must be less than a total activity of 0.2 mCi." As discussed in Reference (e), this boundary condition is not required for the disposal of septic waste approved in Reference (b) nor was it stated in Vermont Yankee's request of Reference (c). The applicable boundary condition for disposal of septic waste and cooling tower silt is a dose limit of 1.0 millirem per year. After discussing this boundary condition, your staff agreed that Vermont Yankee need not obtain prior NRC approval for disposal of septic waste or cooling tower silt material whose activity levels are greater than 0.2 millicuries provided the disposal does not result in exceeding 1.0 millirem per year and a listing of activity levels and the radionuclides present be reported with the Annual Radiological Effluent Release Report. As stated in Reference (e), Vermont Yankee will report in the Annual Radiological Effluent Release Report a list of the radionuclides present and the total radioactivity associated with our onsite disposal activities. Additionally, as requested by your staff in Reference (e), Vermont Yankee will maintain records of radionuclide concentrations and total activity associated with on-site disposal activities in accordance with 10 CFR 50.75(g).

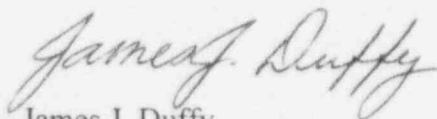
The second discrepancy involves the second boundary condition of Reference (d) which states: "The whole body dose to the hypothetical maximally exposed individual must be less than 0.1 mrem/year." The NRC stated in Reference (e) that this was a typographical error and that the correct value should be 1.0 mrem/year as previously granted by Reference (b).

Therefore, Vermont Yankee requests that the safety evaluation accompanying Reference (d) be revised to 1) delete boundary condition one which states: "The annual disposal must be less than a total activity of 0.2 mCi." and 2) to revise boundary condition two to state: "The whole body dose to the hypothetical maximally exposed individual must be less than 1.0 mrem/year."

We trust that this request is acceptable; however, should you have any questions, please contact this office.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



James J. Duffy
Licensing Engineer

c: USNRC Region I Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS