

August 24, 2000

Mr. Harold W. Keiser
Chief Nuclear Officer & President
Nuclear Business Unit
Public Service Electric & Gas
Company
Post Office Box 236
Hancocks Bridge, NJ 08038

SUBJECT: SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2, ISSUANCE OF
AMENDMENT RE: RETS RELOCATION (TAC NOS. MA8060 AND MA8061)

Dear Mr. Keiser:

The Commission has issued the enclosed Amendment Nos. 234 and 215 to Facility Operating License Nos. DPR-70 and DPR-75 for the Salem Nuclear Generating Station, Unit Nos. 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated January 24, 2000 (LRN-99-0402), as supplemented by letters dated April 19 and May 31, 2000 (LRN-00-0109 and 00-0146, respectively).

The amendments modify the radiological effluent technical specifications (RETS) in the TSs by revising RETS programmatic controls in the administrative controls section of the TSs and relocating specifications to the Offsite Dose Calculation Manual (ODCM) or to the process control program (PCP), in accordance with Generic Letter 89-01. The implementation of the amendments includes the relocations to the PCP and corrections to the ODCM.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/RA/

Robert J. Fretz, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-272 and 50-311

Enclosures: 1. Amendment No. 234 to License No. DPR-70
2. Amendment No. 215 to License No. DPR-75
3. Safety Evaluation

cc w/encls: See next page

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3. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION

PUBLIC	JClifford	OGC	GMeyer, RGN-I	EAdensam	WBeckner
RFretz	ACRS	TClark	GHill(4)	PDI-2 Reading	JDonohew

ACCESSION NUMBER: ML003729153

TEMPLATE = NRR-058

* See previous concurrence

OFFICE	PDIV-2	PDI-2/PM	PDI-2/LA	TSB/BC*	OGC*	PDI-2/SC
NAME	JDonohew	RFretz	TClark	WBeckner	MYoung	JClifford
DATE	8/17/00	8/15/00	8/17/00	06/09/00	07/31/00	8/21/00

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PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-272

SALEM NUCLEAR GENERATING STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 234
License No. DPR-70

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Public Service Electric & Gas Company, Philadelphia Electric Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) dated January 24, 2000, as supplemented by letters of April 19 and May 31, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-70 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 234, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented at the facility within 120 days of the date of issuance, including the relocations to the process control program and the corrections to the Offsite Dose Calculation Manual as specified in the licensee's application dated January 24, 2000, and supplemental letters dated April 19 and May 31, 2000.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: August 24, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 234

FACILITY OPERATING LICENSE NO. DPR-70

DOCKET NO. 50-272

Replace the following pages of the Appendix A, Technical Specifications, with the attached revised pages as indicated. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

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PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-311

SALEM NUCLEAR GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 215
License No. DPR-75

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Public Service Electric & Gas Company, Philadelphia Electric Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) dated January 24, 2000, as supplemented by letters of April 19 and May 31, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-75 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 215, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented at the facility within 120 days of the date of issuance, including the relocations to the process control program and the corrections to the Offsite Dose Calculation Manual as specified in the licensee's application dated January 24, 2000, and supplemental letters dated April 19 and May 31, 2000.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: August 24, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 215

FACILITY OPERATING LICENSE NO. DPR-75

DOCKET NO. 50-311

Replace the following pages of the Appendix A, Technical Specifications, with the attached revised pages as indicated. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 234 AND 215 TO FACILITY OPERATING
LICENSE NOS. DPR-70 AND DPR-75
PUBLIC SERVICE ELECTRIC & GAS COMPANY
PHILADELPHIA ELECTRIC COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY
SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

1.0 INTRODUCTION

By letter dated January 24, 2000, the Public Service Electric & Gas Company (the licensee) submitted a request for changes to the Technical Specifications (TSs) for Salem Nuclear Generating Station, Unit Nos. 1 and 2, (Salem 1/2). The requested changes would revise the radiological effluent technical specifications (RETS) and administrative controls requirements of the TSs by implementing programmatic controls for RETS in the administrative controls section of the TSs and relocating procedural details of the RETS, with various changes, to the offsite dose calculation manual (ODCM) or to the process control program (PCP).

The licensee's application dated January 24, 2000, was supplemented by letters dated April 19 and May 31, 2000, that provided, among other things, corrections to the proposed administrative controls in the TSs for the PCP, the Bases for the TSs, and the ODCM. The changes submitted by the licensee in these supplemental letters are minor clarifications that are within the scope of the initial notice and does not alter the no significant hazards consideration determination published in the Federal Register (65 FR 11094) for the application.

In its application and supplemental letters, the licensee also submitted changes to the Bases of the TSs and the ODCM (Revision 13 dated December 1999) for the two units. The ODCM was reviewed to determine the extent of relocating the RETS to the ODCM. A copy of the PCP was not included in the licensee's application; however, the licensee stated in its letter of May 31, 2000, that the RETS requirements will be relocated to the PCP and the corrections will be made to the ODCM during the implementation of the approved amendments.

There were three conference calls with the licensee on March 15, April 26, and April 28, 2000. The call on March 15 concerned the amendments and is docketed in a memorandum (ADAMS Accession No. ML003697834). The licensee's letters of April 19 and May 31, 2000, provided the information needed by the staff for the amendments. The calls on April 26 and April 28

were concerned with how the licensee will handle the references to 10 CFR Part 20 in the TSs and the ODCM. The latter two calls do not affect the amendments.

2.0 BACKGROUND

The proposed changes to the TSs are to implement the changes to the RETS, ODCM, and PCP that are in Generic Letter (GL) 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program." The GL was issued on January 31, 1989.

The GL provides licensees with guidance for (1) a license amendment to implement programmatic controls in the TSs of a plant for radioactive effluents and radiological environmental monitoring conforming to the applicable regulatory requirements and (2) the relocation of existing procedural details of the RETS to the ODCM. The procedural details for solid radioactive wastes would be relocated to the PCP. The amendment request would (1) incorporate programmatic controls in the administrative section of the TSs that satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50; (2) relocate the procedural details involving radioactive effluent monitoring instrumentation, control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the TSs to the ODCM; (3) relocate the definition of solidification and procedural details in the TSs on solid radioactive wastes to the PCP; (4) simplify the associated reporting requirements; (5) add record retention requirements for changes to the ODCM and PCP; and (6) update the definitions of the ODCM and PCP consistent with the previous changes.

As stated in the GL, the intent of the GL is to allow relocating the procedural and reporting details of the RETS to the ODCM and PCP without reducing the level of radiological effluent control. The procedural details covered in the RETS within the TSs are the limiting conditions for operation (LCOs), their applicability, remedial actions for the LCOs not being met, surveillance requirements (SRs), and the Bases sections for these requirements. These procedural details are to be relocated to the ODCM or PCP, as appropriate, in a manner that ensures that these details are incorporated into plant procedures. The relocation is consistent with the Commission's "Final Policy Statement on Technical Specification Improvements for Nuclear Reactors" (58 FR 39132) and the criteria contained in 10 CFR 50.36a.

The Final Policy Statement gave guidance for evaluating the required scope of plant TSs and defined the guidance criteria to be used in determining which of the LCOs and associated surveillances should remain in the TSs. By this approach, existing LCO requirements that fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TSs; those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36953, July 19, 1995). The four criteria are as follows:

Criterion 1

Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2

A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 3

A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 4

A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Because programmatic controls on radiological effluents from Salem will remain in the TSs and the procedural details being relocated to the ODCM and PCP do not meet the four criteria given above for inclusion in the TSs, the requirements in 10 CFR 50.36a for technical specifications on radiological effluents from nuclear power plants are still being met.

The ODCM was incorporated into the TSs in Amendment Nos. 59 (Unit 1) and 28 (Unit 2). The PCP was incorporated into the TSs in Amendment Nos. 139 (Unit 1) and 117 (Unit 2).

3.0 EVALUATION

Enclosure 2 to the GL provides a summary listing of the specifications that are included under the heading of RETS in the standard technical specifications (STS) and their disposition. Most of these specifications are addressed by the programmatic controls to be placed in the administrative controls section of the TSs. Some specifications under the heading of RETS are not covered by the new programmatic controls and will be retained in the TSs. Because solid radioactive wastes are addressed under existing programmatic controls for the PCP, which is a separate program from the new programmatic controls for liquid and gaseous radioactive effluents, the requirements for solid radioactive wastes and associated solid waste reporting requirements in the TSs are included as procedural details that will be relocated to the PCP. The attached table, which is from the GL, shows the disposition of specifications and administrative controls included under RETS in the STS.

Included in the programmatic controls proposed to be added to Section 6, "Administrative Controls," of the TSs are proposed Specifications 6.8.4.g and 6.8.4.h of the GL. The new specifications are the radioactive effluent controls and radiological environmental monitoring programs for the control of radioactive effluents and maintaining the doses to the public from these radioactive effluents as low as is reasonably achievable (ALARA). The elements of the programs are the specifications proposed to be relocated from the TSs to the ODCM and PCP. An editorial change has been made to the first paragraph of the proposed Specification 6.8.4.g.

In relocating requirements from the TSs for each unit to the single ODCM for both units, there are a few cases where the requirements from the TSs for one unit do not appear in the TSs for the other unit. In these cases, the requirement is stated with "(Unit 1)" or "(Unit 2)" added at the end of the statement to indicate to which unit the requirement applies. Also, in referring to requirements in the TSs, the term "specification" is used. For example, the requirements on the concentration of liquid effluents are in Specification 3/4.11.1.1. In the case of the ODCM, the reference for the same requirements in the ODCM is Control 3/4.11.1.1. As this example shows, the ODCM is arranged by "controls," and the controls numbering system follows the same numbers for specifications in the TSs that are being relocated to the ODCM.

3.1 Table of Contents

The word "oxygen" would be added to the title "Radioactive Gaseous Effluent Monitoring Instrumentation" in the table of contents, page iv, and in the LCO, Action, and SR in Specification 3/4.3.3.9, page 3/4 3-64, because the correct title for the monitoring instrumentation, after the deletion of the other instrumentation that is proposed for Specification 3/4.3.3.9, is radioactive gaseous effluent oxygen monitoring instrumentation. This is addressed in Section 3.4 below.

The licensee has also proposed to (1) delete the references to the subsections of Specifications 3/4.11.1, Liquid Effluents and 3/4.11.2, Gaseous Effluents, and (2) delete the sections on Specifications 3/4.11.3, Solid Radioactive Wastes; 3/4.11.4, Total Dose; and 3/4.12, Radiological Environmental Monitoring (including the three subsections). The sections on Specifications 3/4.11.1, Liquid Effluents and 3/4.11.2, Gaseous Effluents would remain for radioactive effluents, but there would be no reference to radiological environmental monitoring. The licensee also submitted the same changes to the table of contents for the Bases to the TSs. The proposed changes are on pages x and xvi of the table of contents. The proposed changes to delete the subsections of 3/4.11.1, 3/4.11.2, 3/4.11.3, 3/4.11.4, and 3/4.12 are addressed in Sections 3.5 through 3.19 below.

The staff reviewed the proposed changes to the tables of contents for the TSs and the Bases to the TSs. The proposed changes to the table of contents are consistent with the changes proposed to Specifications 3/4.3.3.9, 3/4.11.1.1, 3/4.11.1.2, 3/4.11.1.3, 3/4.11.2.1, 3/4.11.2.2, 3/4.11.2.3, 3/4.11.2.4, 3/4.12.1, 3/4.12.2, and 3/4.12.3 that are addressed in sections of this safety evaluation (SE) below. Based on the conclusions in these sections, the staff concludes that the proposed changes to the table of contents are acceptable.

3.2 Definitions

The definition of the ODCM proposed by the licensee, for page 1-4 of the TSs, is the same definition given in the GL except that the specifications for the annual radiological environmental operating report and the annual radioactive effluent release report in the proposed definition are the specifications for these reports in the administrative controls sections of the TSs. The licensee referred to the annual radioactive effluent release report in the proposed definition instead of to the semi-annual radioactive release report that is in the definition in the GL. The licensee has proposed to go to an annual report in its proposed change for Specification 6.9.1.8 of the TSs. This will be addressed later in this safety evaluation. Because the licensee's proposed definition of the ODCM is consistent with that in the GL and identifies the specifications for the annual radiological environmental operating and

annual radioactive effluent release reports in the TSs, the proposed definition for the ODCM is acceptable.

The definition of PCP proposed by the licensee, for page 1-5 of the TSs, is the definition for the PCP in the GL. Based on this, the staff concludes that the proposed definition of the PCP is acceptable.

The licensee stated in its letter dated May 31, 2000, that the definition of solidification will be relocated from the TSs to the PCP after the amendments are approved, during the implementation of the amendments. On this basis, the staff considers the relocation of the definition of solidification to the PCP to be acceptable.

3.3 Specification 3/4.3.3.8

This specification is on the radioactive liquid effluent monitoring instrumentation. The licensee has proposed to delete (1) the references to the alarm/trip setpoints and the ODCM in the LCO and (2) Action "a" about suspending the release, declaring the channel inoperable, or changing the setpoint if the instrumentation alarm/trip setpoint is not conservative. These are procedural details not required to be in the specification for operability of these monitoring instrumentation channels per 10 CFR 50.36a. As shown in the attached table, the programmatic controls are to be included in a section on the radioactive effluents controls program in the administrative controls section of the TSs. The licensee has also proposed a new Specification 6.8.4.g.1 on radioactive liquid monitoring instrumentation for the radioactive effluent controls program that is the same as the section given in the GL for these programmatic controls. Based on this, the proposed change is acceptable.

The licensee has also proposed changes to Tables 3.3-12, "Radioactive Liquid Effluent Monitoring Instrumentation," and 4.3-12, "Radioactive Liquid Effluent Monitoring Instrumentation Surveillance Requirements," that are referred to in LCO 3.3.3.8 and SR 4.3.3.8. Table 3.3-12 lists the operability requirements for the radioactive liquid effluent monitoring instrumentation and the action to be taken if the operability requirements are not met. Table 4.3-12 lists the surveillance requirements for this instrumentation.

The proposed changes to Table 3.3-12 are to delete (1) the references to the gross radioactivity monitors providing automatic termination of release, gross radioactivity monitors not providing automatic termination of releases, and flow rate measuring devices and (2) Actions 26 through 29 of the table. The proposed changes to Table 4.3-12 are to delete (1) the references to the same instrumentation listed above for deletion in Table 3.3-12 and the surveillance requirements listed in the table for this instrumentation, and (2) notes (1) through (4), and note # on the bottom of the page, of the table. The tank level indicating devices and Action 30 would be the only items left in Table 3.3-12; the same device and notes asterisk and double asterisk would be the only items left in Table 4.3-12.

The chemical waste basin line is included under the gross radioactivity monitors not providing automatic termination or release in the tables for only Unit 2; however, this line is not indicated with (Unit 2) in the ODCM because the line is common to both units.

The licensee has relocated to the ODCM 3/4.3.3.8 the requirements that it is proposing to delete in LCO 3.3.3.8, Action a, and Tables 3.3-12 and 4.3-12. TS SR 4.3.3.8 has been

duplicated in ODCM SR 4.3.3.8. Therefore, the licensee has relocated these requirements to the ODCM. These are the procedural details for the radioactive gaseous effluent monitoring instrumentation which need not be included in the TSs per 10 CFR 50.36a. These proposed changes are also consistent with GL 89-01. Based on the considerations discussed above, the proposed changes to Specification 3/4.3.3.8 are acceptable.

The reference to Unit 1 or Unit 2 in the ODCM is to show that the requirement in parenthesis applies only to that unit. The TSs for the two units have, in a few cases, a requirement for one unit that does not appear in the other unit's TSs.

In ODCM Table 4.3-12, the licensee has made a reference to Unit 2 twice in Note (2). This is incorrect, and Unit 1 should be listed once in place of Unit 2. The reference should be to Unit 1 because the text in the parenthesis is in the Unit 1 TSs and not in the Unit 2 TSs. Also, the licensee listed the chemical waste basin line in ODCM Tables 3.3-12 and 4.3-12 without a reference to a unit and this line appears only in TS Tables 3.3-12 and 4.3-12 for Unit 2. The licensee addressed both of these staff comments in its letter of May 31, 2000. The reference to Unit 2 twice will be corrected during the implementation of the amendments, and the chemical basin line is common to both units and should be listed without a reference to either unit.

The licensee is deleting the source check as a surveillance requirement for SR 4.3.3.8 because there is no source check for the tank level indicating devices for outside storage tanks. In the current TS Table 4.3-12, there is a not applicable or N.A. for the source check for these devices. Based on this, the staff concludes that deleting the source check for SR 4.3.3.8 is acceptable because these devices are the only instrumentation remaining in TS Table 4.3-12 on instrumentation surveillance requirements.

The licensee has also proposed to add the phrase "(now NIST)" to the ODCM where there is a reference to the National Bureau of Standard, because the National Bureau of Standards has been renamed the National Institute of Science and Technology (NIST). The staff concludes that this correction to the reference to the National Bureau of Standards is accurate, and is, therefore, acceptable.

3.4 Specification 3/4.3.3.9

The licensee has proposed to add the word oxygen to the title of the specification. The specification would be changed from "Radioactive Gaseous Effluent Monitoring Instrumentation" to "Radioactive Gaseous Effluent Oxygen Monitoring Instrumentation." This change is proposed because the licensee has also proposed to delete all instrumentation from Table 3.3-13, "Radioactive Gaseous Effluent Monitoring Instrumentation," and Table 4.3-13, "Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements," except for the oxygen monitor in the waste gas holdup system. Because the only instrumentation to be left in this specification is the oxygen monitor, the change to the title would appropriately reflect that the requirements pertain to that instrumentation. Therefore, the staff concludes that the proposed addition of the word oxygen to the specification and to the associated Tables 3.3-13 and 4.3-13 is acceptable.

In deleting the other instrumentation from Tables 3.3-13 and 4.3-13, the licensee is also proposing to delete (1) all the requirements on operability, applicability, actions to be taken, surveillance requirements, and table notes for this instrumentation in the two tables; (2) replace

the reference to suspending the release of radioactive gaseous effluents by the statement “and take the action shown in Table 3.3-13”; and (3), in reporting why the inoperability was not corrected in a timely manner, replace the reference to the next semi-annual radioactive effluent release report by the statement “prepare and submit a special report pursuant to Specification 6.9.2 to explain.” The reference to semi-annual effluent release report to report why an inoperability was not corrected in a timely manner needs to be changed because the licensee is proposing to change Specification 6.9.1.8 to go from a semi-annual effluent release report to an annual report. The license has proposed to refer to a special report under Specification 6.9.2 in place of the annual effluent release report.

The licensee has relocated to the ODCM 3/4.3.3.9 the requirements that it is proposing to delete in LCO 3.3.3.9, Action a, and Tables 3.3-13 and 4.3-13. SR 4.3.3.9 has been duplicated in ODCM SR 4.3.3.9. These are the procedural details for the radioactive gaseous effluent monitoring instrumentation that do not meet the criteria for inclusion in plant TSs per 10 CFR 50.36a. Therefore, the licensee has relocated these requirements to the ODCM. The licensee has also proposed a new Specification 6.8.4.g.1 on radioactive gaseous monitoring instrumentation for the radioactive effluent controls program that is the same as the section given in the GL for these programmatic controls. This, as well as the other proposed changes, are consistent with GL 89-01. In addition, the staff has verified that the references to “{Unit 1}” for requirements applying to only Unit 1 are correct. The reference to a special report is a better means to report the information on untimely corrections of inoperability because it is a single report and the annual effluent release report will provide a summary of the quantities of radioactive liquid, gases, and solid wastes released from the units. The special report is also used in Specifications 3/4.11.1.2 and 3/4.11.1.3 to report similar reports as untimely correction of inoperability. Therefore, the proposed reference of the special report in Action b for LCO 3.3.3.9 is acceptable.

The licensee is also deleting the source check as a surveillance requirement for SR 4.3.3.9 because there is no source check for the oxygen monitor. In the current TS Table 4.3-13, there is a not applicable or N.A. for the source check for the oxygen monitor. Based on this, the staff concludes that deleting the source check for SR 4.3.3.9 is acceptable because this requirement is unnecessary since the oxygen monitor is the only instrumentation remaining in TS Table 4.3-13 on instrumentation surveillance requirements.

In the attached table for radioactive gaseous effluent monitoring instrumentation, the GL stated that existing requirements for explosive gas monitoring instrumentation should be retained in the TSs. The oxygen monitor in the waste gas holdup tank is the explosive gas mixture instrumentation and it is being retained in the TSs. The staff concludes that this is acceptable.

3.5 Specification 3/4.11.1.1

The licensee has proposed to delete the entirety of Specification 3/4.11.1.1 on concentration for liquid effluents from the TSs. This includes the deletion of Table 4.11-1, “Radioactive Liquid Waste Sampling and Analysis Program.” These requirements are the procedural details for maintaining the concentration of liquid effluents from the units within the regulations and are not necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee has relocated these requirements to the ODCM.

The licensee has also proposed new Specifications 6.8.4.g.2 and g.3 on the concentrations and analysis of radioactive material released in liquid effluents for the radioactive effluent controls program that are the same as the sections given in the GL for these programmatic controls. The proposed Specifications 6.8.4.g.2 and g.3 are consistent with GL 89-01 and provide the programmatic controls for the requirements in Specification 3/4.11.1.

Therefore, for Specification 3/4.11.1.1, because the licensee is replacing effluent requirements that are not needed in the TSs with programmatic controls in Section 6 ("Administrative Controls") of the TSs and relocating procedural details in the TSs to the ODCM consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that these proposed changes are acceptable.

3.6 Specification 3/4.11.1.2

The licensee has proposed to delete the entirety of Specification 3/4.11.1.2 on doses for liquid effluents from the TSs. These requirements are the procedural details for maintaining the concentration of liquid effluents from the units within the regulations and are not necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee has relocated these requirements to the ODCM.

The licensee has also proposed new Specifications 6.8.4.g.4 and g.5 on limitations on doses to the public for the radioactive effluent controls program, that are the same as the sections given in the GL for these programmatic controls. The proposed changes are consistent with GL 89-01 and provide the programmatic controls for the requirements in Specification 3/4.11.1.2.

Therefore, for Specification 3/4.11.1.2, because the licensee is replacing effluent requirements that are not needed in the TSs with programmatic controls and relocating procedural details from the TSs to the ODCM consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that these proposed changes are acceptable.

3.7 Specification 3/4.11.1.3

The licensee has proposed to delete the entirety of Specification 3/4.11.1.3 on the liquid radwaste treatment system from the TSs. These requirements are the procedural details for maintaining and using the system to reduce the radioactive liquid effluent from the units to within regulatory limits and are not necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee has relocated these requirements to the ODCM.

The licensee has also proposed a new Specification 6.8.4.g.6 on the use of radioactive liquid radwaste treatment systems for the radioactive effluent controls program that is the same as the section given in the GL for these programmatic controls. This proposed change is consistent with GL 89-01 and provides the programmatic controls for the requirements in Specification 3/4.11.1.3.

Therefore, for Specification 3/4.11.1.3, because the licensee is replacing effluent requirements that are not needed in the TSs with programmatic controls and relocating procedural details in the TSs to the ODCM consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that the proposed changes are acceptable.

3.8 Specification 3/4.11.2.1

The licensee has proposed to delete the entirety of Specification 3/4.11.2.1 on dose rates from gaseous effluents from the TSs. This includes the deletion of Table 4.11-2, "Radioactive Gaseous Waste Sampling and Analysis Program." These requirements are the procedural details for maintaining the dose rate from radioactive gaseous effluent within regulatory limits and are not necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee has relocated these requirements to the ODCM.

The licensee has also proposed new Specifications 6.8.4.g.3 and g.7 on the analysis and dose limitations on radioactive gaseous effluents for the radioactive effluent controls program, that are the same as the sections given in the GL for these programmatic controls. The proposed changes are consistent with GL 89-01 and provide the programmatic controls for the requirements in Specification 3/4.11.2.1.

Therefore, for Specification 3/4.11.2.1, because the licensee is replacing effluent requirements that are not needed in the TSs with programmatic controls and relocating procedural details in the TSs to the ODCM consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that these proposed changes are acceptable.

3.9 Specification 3/4.11.2.2

The licensee has proposed to delete the entirety of Specification 3/4.11.2.2 on dose rates from noble gases in gaseous effluents from the TSs. These requirements are the procedural details for maintaining the dose rate from noble gases in radioactive gaseous effluent within the guidelines for as low as is reasonably achievable (ALARA) in Appendix I to 10 CFR Part 50. These requirements are not necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee has relocated these requirements to the ODCM.

The licensee has also proposed new Specifications 6.8.4.g.5 and g.8 on dose limitations for radioactive gaseous effluents for the radioactive effluent controls program that are the same as the sections given in the GL for these programmatic controls. This proposed change is consistent with GL 89-01 and provides the programmatic controls for the requirements in Specification 3/4.11.2.2.

Therefore, for Specification 3/4.11.2.2, because the licensee is replacing effluent requirements that are not needed in the TSs with programmatic controls and relocating procedural details in the TSs to the ODCM consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that these proposed changes are acceptable.

3.10 Specification 3/4.11.2.3

The licensee has proposed to delete the entirety of Specification 3/4.11.2.3 on Iodine-131, tritium, and radioactive material in particulate form (with half lives greater than 8 days) in gaseous effluents from the TSs. These requirements are the procedural details for maintaining these radioactive forms in radioactive gaseous effluent within the guidelines for ALARA in Appendix I to 10 CFR Part 50. These requirements are not necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee has relocated these requirements to the ODCM.

The licensee has also proposed new Specifications 6.8.4.g.5 and g.9 on dose limitations for Iodine-131, tritium, and radioactive material in particulate form in gaseous effluents for the radioactive effluent controls program that are the same as the sections given in the GL for these programmatic controls. The proposed changes are consistent with GL 89-01 and provide the programmatic controls for the requirements in Specification 3/4.11.2.3.

Therefore, for Specification 3/4.11.2.3, because the licensee is replacing effluent requirements that are not needed in the TSs with programmatic controls and relocating procedural details in the TSs to the ODCM consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that these proposed changes are acceptable.

3.11 Specification 3/4.11.2.4

The licensee has proposed to delete the entirety of Specification 3/4.11.2.4 on operating the gaseous radwaste system from the TSs. These requirements are the procedural details for maintaining and using the system to have radioactive gaseous effluent within the guidelines for ALARA in Appendix I to 10 CFR Part 50. These requirements are necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee has relocated these requirements to the ODCM.

The licensee has also proposed a new Specification 6.8.4.g.6 on the use of the gaseous radwaste system for the radioactive effluent controls program that is the same as the section given in the GL for these programmatic controls. This proposed change is consistent with GL 89-01 and provides the programmatic controls for the requirements in Specification 3/4.11.2.4.

Therefore, for Specification 3/4.11.2.4, because the licensee is replacing effluent requirements that are not needed in the TSs with programmatic controls and relocating procedural details in the TSs to the ODCM consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that the proposed changes are acceptable.

3.12 Specification 3/4.11.3

The licensee has proposed to delete the entirety of Specification 3/4.11.3 on operating the solid radwaste system from the TSs. These requirements are the procedural details for maintaining and using the system to have solid radwaste shipped from the units meet the shipping and burial ground requirements, and are not necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee stated in its letter of May 31, 2000, that these requirements would be relocated to the PCP. The licensee has also proposed a change to Specification 6.13.2 on changes to the PCP that is consistent with GL 89-01. Therefore, because the proposed deletion of Specification 3/4.11.2.3 is consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that the proposed change is acceptable.

3.13 Specification 3/4.11.4

The licensee has proposed to delete from the TSs the entirety of Specification 3/4.11.4 on the total annual dose or dose commitment for radioactive effluents to any member of the public from the uranium fuel cycle sources. These requirements are the procedural details for maintaining the total dose to the public from the uranium fuel cycle sources within the regulations and are not necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee has relocated these requirements to the ODCM. The licensee has also proposed a new

Specification 6.8.4.g.11 on limitations on the annual dose to the public from radioactivity released from the units for the radioactive effluent controls program that is the same as the section in the GL for these programmatic controls. Therefore, because the proposed change is consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that the proposed deletion of Specification 3/4.11.4 is acceptable.

3.14 Specification 3/4.12.1

The licensee has proposed to delete the entirety of Specification 3/4.12.1 on the radiological environmental monitoring program from the TSs. This includes the deletion of Table 3.12-1, "Radiological Environmental Monitoring Program," Table 3.12-2, "Reporting Levels for Radioactivity Concentrations in Environmental Samples," and Table 4.12-1, "Maximum Values for the Lower Limits of Detection (LLD)." These requirements are the procedural details for maintaining and operating the program to monitor radioactive releases to the environment from the units and are not necessary for inclusion in the TSs per 10 CFR 50.36a. The licensee has modified these requirements and relocated them to the ODCM. The licensee has also proposed a new Specification 6.8.4.h.1 on the monitoring and analysis of radioactivity in the environment for the radiological environmental monitoring program that is the same as the section given in the GL for these programmatic controls. Because this proposed change is consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that the proposed deletion of Specification 3/4.12.1 is acceptable.

In reviewing the three tables being relocated from the TS to the ODCM, the staff found differences between the ODCM tables and the TS tables, including the notes for the table. The differences between the ODCM and TS Table 3.12-1 are minor and not substantive, clarify the requirements in the ODCM table, or add additional requirements to the table, except for the following differences: (1) notes c and f of the TS table are not relocated to the ODCM table, (2) the quantity of the samples for waterborne samples in the sampling and collection frequency column of the TS table are not relocated to the ODCM table, and (3) the reference to Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purposes of Evaluating Compliance with 10 CFR 50, Appendix I," Revision 1, dated October 1977, for doses calculated for the maximum organ and age group in note k to the TS table is replaced by the reference to the ODCM in the note for the ODCM table.

The licensee stated in its May 31, 2000, letter that items (1) and (2) exist because it wants to make Table 3.12-1 in the ODCM for Salem 1/2 identical to the corresponding table in the ODCM for Hope Creek. The licensee stated that the three units share the same site boundary (i.e., the units are adjoining) and it wanted the radiological environmental monitoring program of ODCM Table 3.12-1 conducted as one common program for the three units. The radiological environmental monitoring program for Hope Creek was approved by the staff in the Hope Creek Amendment No. 121, dated September 8, 1999. Because the staff approved the program for Hope Creek, the staff concludes that the two modifications described above which provide for a common environmental monitoring program for the three units are acceptable.

With respect to item (3), the Bases for Specification 3/4.11.1.2 (dose for liquid effluents), 3/4.11.2.2 (dose - noble gases), and 3/4.11.2.3 (dose - iodine-131, tritium, and radionuclides in particulate form) to be relocated to the ODCM Bases for these requirements, contain the statement that the equations specified in the ODCM for calculating the doses due to the actual

release rates of radioactive materials in liquid and gaseous effluents are “consistent with the methodology provided in Regulatory Guide 1.109 ... Revision 1, October 1977”

There are no differences between the ODCM and TS Table 3.12-2. The differences between the ODCM and TS Table 4.12-1 either clarify the requirements in the ODCM table or add additional requirements to the table. The staff concludes that the differences are minor and not substantive, or clarify the requirements being relocated. Based on the above review of the differences between the ODCM and TS Tables 3.12-1, 3.12-2, and 4.12-1, the additional information in the ODCM tables are acceptable.

3.15 Specification 3/4.12.2

The licensee has proposed to delete the entirety of Specification 3/4.12.2 on the land use census for the radiological environmental monitoring program from the TSs. These requirements are the procedural details for conducting the land use census to ensure that changes in the use of areas at and beyond the site boundary are identified and that modifications of the radiological environmental monitoring program are made in response to the land use changes to keep the monitoring program effective. This specification does not meet the criteria in 10 CFR 50.36a for inclusion in the TSs. The licensee has relocated these requirements to the ODCM. The licensee has also proposed a new Specification 6.8.4.h.2 on the land use census for the radiological environmental monitoring program that is the same as the section given in the GL for these programmatic controls. Because these proposed changes are consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that the proposed deletion of Specification 3/4.12.2 is acceptable.

3.16 Specification 3/4.12.3

The licensee has proposed to delete the entirety of Specification 3/4.12.3 on the inter-laboratory comparison program from the TSs. These requirements are the procedural details for conducting the land use census to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sampling are performed as part of quality assurance for the radiological environmental monitoring program. This specification does not meet the criteria in 10 CFR 50.36a for inclusion in the TSs. The licensee has relocated these requirements to the ODCM. The licensee has also proposed a new Specification 6.8.4.h.3 on the participation in the inter-laboratory comparison program for the radiological environmental monitoring program that is the same as the section given in the GL for these programmatic controls. Because the proposed changes are consistent with 10 CFR 50.36a and GL 89-01, the staff concludes that the proposed deletion of Specification 3/4.12.3 is acceptable.

3.17 Specification 6.9.1.7

The licensee has proposed to replace the entirety of Specification 6.9.1.7 on the annual radiological environmental operating report in the TSs (Specification 6.9.1.3 in the GL) with the description of the report in the GL, except that the footnote (an asterisk) for the specification will be retained. The footnote states that a single submittal may be made for a multiple unit site, such as Salem 1/2, and describes the single submittal. This footnote is still applicable to Salem 1/2 and should remain in the TSs because the requirements for an annual radiological environmental operating report for both units remains in the TSs. Because the footnote

clarifies the requirement and the proposed replacement of the text in Specification 6.9.1.7 is consistent with GL 98-01, the staff concludes that the proposed change is acceptable.

The current Specification 6.9.1.7 is in Section 6.9.1.7 of the ODCM on the annual radiological environmental operating report.

3.18 Specification 6.9.1.8

The licensee has proposed to replace the entirety of Specification 6.9.1.8 on the semiannual radioactive effluent release report in the TSs with the description of an annual radioactive release report, except that the footnote (an asterisk) for the specification will be retained. The proposed description of the report is the same as that given in the GL except the report will be for a year instead of being for 6 months in the GL. Extending the reporting period from 6 months to 12 months is consistent with the reporting period for the annual radiological environmental operating report, the annual reporting period in the standard of the Improved Technical Specifications for Westinghouse plants as Salem 1/2, and the reporting period determined to be sufficient for reporting the radioactive effluent releases at other operating nuclear power plants. The same reporting deadline of before May 1 of each year is included in the proposed text. Because the proposed change provides an acceptable reporting period that coincides with the period for the annual radiological environmental operating report and is consistent with GL 89-01, the staff concludes that the proposed replacement of the text in Specification 6.9.1.8 with the 12-month report period is acceptable.

The current Specification 6.9.1.8 with the reporting period extended to 12 months is in Section 6.9.1.8 of the ODCM on the radioactive effluent release report.

3.19 Specification 6.10

The licensee has proposed to add to Specification 6.10 on record retention in the TSs the requirement that records of reviews performed for changes to the ODCM and PCP be retained. The language proposed will provide for orderly and controlled revisions to the ODCM and PCP, add new requirements to the TSs, and is the same language that is in the GL. Therefore, the staff concludes that the proposed Specification 6.10 on record retention for changes to the ODCM and PCP is acceptable.

3.20 Specification 6.13

The licensee has proposed to replace Specification 6.13.2 on changes to the PCP with the same wording in the GL. The requirements in proposed Specification 6.13.2 are the same as the requirements in the current specification, although worded differently, except that the proposed specification (1) adds the requirement that the changes to the PCP shall also be approved by the plant manager and (2) deletes the requirement that the changes to the PCP shall be submitted to the Commission in the semiannual radioactive effluent release report, which the staff decided in GL 89-01 is not needed because records of these changes are required to be kept by the licensee per the new Specification 6.10 (addressed in the previous section). Because the proposed change deletes a reporting requirement in Specification 6.13.2, which has substantively been retained in another specification, and is consistent with GL 89-01, the staff concludes that the proposed change is acceptable.

3.21 Specification 6.14

The licensee has proposed to replace Specification 6.14.2 on changes to the ODCM with the same wording in the GL. The requirements in proposed Specification 6.14.2 are the same as the requirements in the current specification, although not worded the same, except that the proposed specification adds the requirement that the changes to the ODCM shall also be approved by the plant manager. Because the proposed change does not delete requirements from the Specification 6.14.2 and is consistent with GL 89-01, the staff concludes that the proposed change is acceptable.

3.22 Specification 6.15

Although the GL provided guidance for this specification in stating that procedural details could be relocated to the ODCM and PCP, the licensee has decided not to propose any changes to Specification 6.15 on major changes to radioactive liquid, gaseous, and solid waste treatment systems. Although the licensee has not proposed any changes to the details on major changes in Specification 6.15 of the TSs, it has incorporated Specification 6.15, including changes to the solid radwaste treatment system, in Section 6.15 of the ODCM. Therefore, the staff concludes that it is not necessary to relocate the procedural details in Specification 6.15 to the PCP and that retaining Specification 6.15, as it is written in the TSs, is acceptable.

3.23 Bases to the TSs

The licensee has submitted the changes to the Bases for the specifications proposed to be changed in the amendments. Primarily, the Bases of the TSs are being relocated to the ODCM or PCP, although there are also some corrections to the Bases. The Bases of the ODCM uses the word "Controls" in referring to sections of the ODCM, as the TSs use "Specification" in referring to sections of the TSs. The staff notes that the Bases changes proposed for the TSs, ODCM, and PCP are consistent with the proposed relocation of the RETS in the TSs to the ODCM and PCP.

3.24 Offsite Dose Calculation Manual

The licensee submitted Revision 13 of its ODCM for both units in its application for the proposed amendments. The definition of ODCM, and Specifications 3/4.3.3.8 (radioactive liquid effluent monitoring instrumentation), 3/4.3.3.9 (radioactive gaseous effluent monitoring instrumentation), 3/4.11.1.1 (radioactive liquid effluent concentrations), 3/4.11.1.2 (radioactive liquid effluent doses), 3/4.11.1.3 (radioactive liquid radwaste treatment system), 3/4.11.2.1 (radioactive gaseous effluent doses), 3/4.11.2.2 (radioactive gaseous effluents noble gases), 3/4.11.2.3 (radioactive gaseous effluents I-131, tritium, and particulate matter), 3/4.11.2.4 (radioactive gaseous radwaste treatment systems), 3/4.11.4 (radioactive effluents total dose), 3/4.12.1 (radiological environmental monitoring program), 3/4.12.2 (radiological monitoring land use census), 3/4.12.3 (radiological monitoring interlaboratory comparison program), 6.9.1.7 (annual radiological environmental operating report), 6.9.1.8 (radioactive effluent release report), and 6.15 (major changes to the radwaste treatment systems) were identified in the GL and addressed in Sections 3.2 through 3.11, 3.13 through 3.18, and 3.22, respectively, of this SE. Based on these sections, the staff concludes that the licensee's proposed relocations from the TSs to the ODCM are acceptable. These relocations will be completed during the implementation of the approved amendments within 120 days of approval of the amendments.

The ODCM Revision 13 was reviewed by the staff against the guidance provided in GL 89-01. Revision 13 was accepted by the SORC as an approved and effective revision to the ODCM on December 22, 1999. The revision summary on the second page to the ODCM lists the revisions that incorporate the RETS from the TSs and the differences between the two units (because the equipment information being relocated from the TSs is not always the same for both units).

The ODCM provides definitions, controls, and surveillance requirements, and Bases for the radioactive effluent and environmental monitoring programs; design features; administrative controls; and calculational methodologies. Controls are defined in the ODCM as the new name for the limiting conditions for operation (LCOs) in the RETS that are being relocated to the ODCM in this amendment. The definition states that this will distinguish between the LCOs remaining in the TSs and the LCOs, renamed Controls, that are being relocated to the ODCM.

The definitions in the ODCM were compared to the definitions in the TSs, including the tables on operational modes and frequency notation. The ODCM definitions were the same (except the word "specification" in the TSs was replaced by the word "control" in the ODCM as discussed in the previous paragraph) as those in the TSs except the ODCM does not have all the definitions in the TSs, has the new definitions of "Controls" discussed above and "Waste Gas Holdup System," and three ODCM definitions have differences from their counterpart TS definitions, as described below:

- Channel Calibration: The definition in the ODCM does not include the statements about calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors.
- Offsite Dose Calculational Manual: The definition in the ODCM also states that the ODCM contains (1) the radioactive effluent controls and radiological environmental monitoring programs and (2) descriptions of the information that should be included in the annual radiological environmental operating and radioactive effluent release reports.
- Site Boundary: The definition in the ODCM does not state that the site boundary defines the exclusion area.

These differences from the TSs were understandable based on the purpose of the ODCM which does not involve (RTD) or thermocouple sensors or the exclusion area boundary. There were no definitions in the TSs that the staff believed should be added to the ODCM.

As stated in the GL, the procedural details covered in the RETS within the TSs are the limiting conditions for operation (LCOs), their applicability, remedial actions for the LCOs not being met, surveillance requirements (SRs), and the Bases sections for these requirements are to be relocated to the ODCM. The requirements in Specifications 3/4.3.3.8 (radioactive liquid effluent monitoring instrumentation), 3/4.3.3.9 (radioactive gaseous effluent monitoring instrumentation), 3/4.11.1 (liquid effluents), 3/4.11.2 (gaseous effluents), 3/4.11.4 (total dose), 3/4.12 (radiological monitoring program), and Bases, that are being relocated to the ODCM and were discussed in Sections 3.3 through 3.16 and Section 3.23 of this SE, are the procedural details discussed in the GL. The Specifications 6.9.1.7, 6.9.1.8, and 6.15 of the TSs on the annual radiological environmental operating report, the radioactive effluent release report, and the

major changes to the radwaste treatment systems are in the ODCM. Therefore, these sections of the ODCM are consistent with the GL.

There are a few changes in the ODCM in the section on calculational methodologies. The changes are described in Part II of the revision summary on the two pages following the title page of the ODCM that is attachment 5 to the licensee's application dated January 24, 2000. These changes are controlled by Section 5.5.1 of the TSs and are not part of the relocation of the RETS from the TSs to the ODCM.

As stated in Section 3.17 of this SE, the Bases for Specification 3/4.11.1.2 (dose for liquid effluents), 3/4.11.2.2 (dose - noble gases), and 3/4.11.2.3 (dose - iodine-131, tritium, and radionuclides in particulate form), which are to be relocated to the ODCM Bases for these requirements, contain the statement that the equations specified in the ODCM for calculating the doses due to the actual release rates of radioactive materials in liquid and gaseous effluents are "consistent with the methodology provided in Regulatory Guide 1.109 ... Revision 1, October 1977" Also, these Bases state that these equations in the ODCM are consistent with Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors," Revision 1, dated October 1977. These regulatory guides are the proper guidance from the staff on doing the calculations for doses from radioactive material in liquid and gaseous effluents from the units.

In relocating the RETS from the TSs to the ODCM, the RETS are no longer in the TSs and further changes to these requirements will not be done in accordance with 10 CFR 50.90 which requires prior staff review and approval. Future changes to these requirements in the ODCM will be controlled under Specification 6.14.2 of the TSs, which has the same requirements controlling changes to the PCP that are in GL 89-01, and changing ODCM requirements will not alter the effluent limits required by the regulations. The licensee's proposed changes to Specification 6.14.2 were addressed in Section 3.21 of this SE.

Based on the above considerations, the staff concludes that the ODCM for Salem 1/2 appropriately incorporates the RETS being relocated from the TSs and has appropriate controls in the TSs to manage future changes to the ODCM.

3.25 Process Control Program

The licensee did not submit the PCP for the two units in its application for the amendments. The licensee stated in its application that the relocations to the PCP that are identified in the GL would be done. The definitions of PCP and solidification, and Specifications 3/4.11.3 (solid radioactive waste), 6.9.1.8 (reporting requirements), 6.13 (process control program changes), and 6.15 (major changes to solid radwaste treatment system) were identified in the GL and addressed in Sections 3.2, 3.12, 3.20, and 3.22, respectively, of this SE. Based on these sections, the staff concludes that the licensee's proposed relocations from the TSs to the PCP are acceptable. These relocations will be completed during the implementation of the approved amendments within 120 days of approval of the amendments.

In relocating the RETS from the TSs to the PCP, the RETS are no longer in the TSs and further changes to these requirements will not be done in accordance with 10 CFR 50.90, which requires prior staff review and approval. Changes to these requirements in the PCP in the

future will be under Specification 6.13.2 of the TSs, which has the same requirements controlling changes to the PCP that are in GL 89-01, and changing the requirements in the PCP will not alter the solidification and shipping requirements required by the regulations. The licensee's proposed changes to Specification 6.13.2 were addressed in Section 3.20 of this SE.

Based on the above considerations, the staff concludes that the PCP for Salem 1/2 appropriately incorporates the RETS being relocated from the TSs and has appropriate controls in the TSs to manage future changes to the ODCM.

3.26 Review of Applicable 10 CFR Part 20 Requirements

GL 89-01 was issued on January 31, 1989, and referenced the requirements of 10 CFR 20.106 for control of releases of radioactive effluents to the public. This requirement is consistent with the Bases for TSs 3/4.11.1, "Liquid Effluents," and 3/4.11.2, "Gaseous Effluents," which also reference 10 CFR 20.106.

After the issuance of the GL, 10 CFR Part 20, "Standards for Protection Against Radiation," was revised and became effective for all NRC licensees on January 1, 1994. The "old" Part 20 regulation (i.e., Part 20 prior to the revision) consisted of Sections 20.1 through 20.601 while the "new" Part 20 consists of Sections 20.1001 through 20.2402. Section 20.1008, "Implementation," of the "new" Part 20 states that any existing license condition or TS that is more restrictive than a requirement in the "new" Part 20 remains in force until there is a TS change, license amendment, or license renewal.

In a letter dated April 28, 1993, the Nuclear Management and Resources Council (NUMARC) requested that the NRC review its characterization of the intent and applicability of the implementation of the "new" Part 20 with regard to 10 CFR Part 50 licensee's RETS. Specifically, the NUMARC letter provided its position which included the following general principles:

- The general intent of the "new" Part 20 implementation requirements with regard to TSs is to assure that applicable requirements in the "new" Part 20 are met and, where more restrictive, the existing TSs remain in force.
- The general intent of "new" Part 20 is that radiation doses to members of the public not exceed 100 mrem per year, which is more restrictive than the 500 mrem per year limit in the "old" Part 20, and that fuel cycle licensees also comply with 40 CFR Part 190. The "new" Part 20 does not include a requirement on limiting radioactive concentrations in effluents, which is less restrictive than the "old" Part 20.
- The general intent of the RETS issued in Part 50 licenses is to assure that annual radiation doses to any member of the public due to effluents will not exceed 25 mrem to the whole body, 75 mrem to the thyroid, and 25 mrem to any other organ, as required by 40 CFR Part 190; and that radiological effluents, when averaged over one hour, will not exceed the maximum permissible concentrations in the "old" Part 20, Appendix B, Table II, for liquid effluents and the dose rate associated with that table for gaseous effluents.
- The Part 50 licensee RETS, as referenced in the "old" Part 20, are generally more restrictive than the comparable requirements in the "new" Part 20.

The NUMARC letter of April 28, 1993, concluded that the RETS that reference the "old" Part 20 are generally more restrictive than the comparable requirements of the "new" Part 20, and therefore, in accordance with 10 CFR 20.1008, the existing RETS could remain in force after the licensee implements the "new" Part 20 or until there is a change to the applicable TSs. The letter stated that the existing RETS which reference the "old" Part 20 would maintain the level of required protection of public health and safety, and would be consistent with the requirements of the "new" Part 20.

The licensee's application stated that the licensee intends to operate Salem 1/2 within the requirements of the "old" Part 20 and its appendices for the release of radioactive effluents from the units. The letter further stated that the method currently in use for controlling radioactive releases to within the "old" 10 CFR 20.106, Appendix B maximum permissible concentration (MPC) limits based on instantaneous concentration values is still suitable for demonstrating conformance to the requirements of the "new" Part 20, Appendix B, effluent concentration limits.

The application also references a letter dated June 30, 1993, from Thomas E. Murley, then Director of the Office of Nuclear Reactor Regulation, NRC, to Thomas E. Tipton of NUMARC, which provided the NRC's response to the NUMARC letter discussed above, of April 28, 1993. The NRC response states in part that:

After careful review of your [NUMARC's] position and relevant factors, we have determined that it is acceptable to the staff for licensees to retain their existing level of effluent control as implementing the ALARA [as low as is reasonably achievable] requirement after January 1, 1994, without submitting individual requests for amending their technical specifications to comply with the new 10 CFR 1101(b). Therefore, the instantaneous release rate limits, which are specified by reference to the values in Appendix B, will continue to be the values in Appendix B prior to the revision, until the technical specifications are changed.

Based on the above, and the fact that the RETS are being relocated without any changes to the ODCM and PCP, the staff finds it is acceptable for the existing Salem 1/2 RETS, which reference the requirements of 10 CFR 20.106 for control of releases of radioactive effluents to the public, to be relocated to the ODCM without being changed to the "new" Part 20 requirements. The RETS for Hope Creek Generating Station were relocated to the ODCM and PCP without the RETS being changed to the "new" Part 20 requirements in Amendment No. 121 issued September 8, 1999. Therefore, approving the same relocation for Salem 1/2 will keep the ODCM the same for the two sites that the licensee is operating. Also, the ODCM is not a high level document with respect to the license (i.e., it is not listed in the license nor is the change control process for the document in the regulations, such as is true for the final safety analysis report which has its change control process specified in 10 CFR 50.59). However, the staff recommended in the conference call of April 26, 2000, that the licensee add to the ODCM a paragraph that explains that the references in the ODCM are to the "old" Part 20, and provide the explanation above that the "old" Part 20 requirements are more restrictive than the "new" Part 20 requirements. These will be administrative and editorial changes to the ODCM which do not affect any requirements on the licensee.

3.27 Conclusions

In the proposed amendments for Salem 1/2 to relocate the RETS from the TSs to ODCM and PCP, the licensee has proposed changes that are consistent with GL 89-01. Based on the staff's evaluation of the proposed changes, as discussed in the previous sections, the staff concludes that the proposed amendments are acceptable. The licensee stated in its letter of May 31, 2000, that the proposed relocations from the TSs to the PCP and the corrections to the ODCM identified in the May 31, 2000, letter will be relocated and corrected during the implementation of the approved amendments (i.e., within 120 days from the date of issuance of the amendments) as reflected on the license change pages.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Jersey State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (65 FR 11094). The amendments also change recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Attachment: Table on Disposition of Specifications and Administrative Controls

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Date: August 24, 2000

DISPOSITION OF SPECIFICATIONS AND ADMINISTRATIVE CONTROLS
INCLUDED UNDER THE HEADING OF RETS IN THE STANDARD TECHNICAL SPECIFICATIONS
(From GL 89-01)

Specification ⁽¹⁾	Subject	Disposition per GL 89-10
1.17	Offsite Dose Calculation Manual (ODCM)	Definition is updated to reflect the expanded scope of the ODCM.
1.22	Process Control Program (PCP)	Definition is relocated to the PCP.
1.30	Solidification	Definition is relocated to the PCP.
3/4.3.3.8	Radioactive Liquid Effluent Monitoring Instrumentation	Programmatic controls are included in 6.8.4.g.1. Existing specification procedural details are relocated to the ODCM.
3/4.3.3.9	Radioactive Gaseous Effluent Monitoring Instrumentation	Programmatic controls are included in 6.8.4.g.1. Existing specification procedural details are relocated to the ODCM. Existing requirements for explosive gas monitoring instrumentation should be retained. Model specifications are in Enclosure 4 to the GL.
3/4.11.1.1.	Liquid Effluents: Concentration	Programmatic controls are included in 6.8.4.g.2 and g.3. Existing specification procedural details are relocated to the ODCM.
3/4.11.1.2	Liquid Effluents: Dose	Programmatic controls are included in 6.8.4.g.4 and g.5. Existing specification procedural details are relocated to the ODCM.
3/4.11.1.3	Liquid Effluents: Liquid Radwaste Treatment System	Programmatic controls are included in 6.8.4.g.6. Existing specification procedural details are relocated to the ODCM.
3/4.11.1.4	Liquid Holdup Tanks	Existing specification requirements are retained in the TSs.
3/4.11.2.1	Gaseous Effluents: Dose Rate	Programmatic controls are included in 6.8.4.g.3 and g.7. Existing specification procedural details are relocated to the ODCM.

Specification ⁽¹⁾	Subject	Disposition per GL 89-10
3/4.11.2.2	Gaseous Effluents: Dose - Noble Gases	Programmatic controls are included in 6.8.4.g.5 and g.8. Existing specification procedural details are relocated to the ODCM.
3/4.11.2.3	Gaseous Effluents: Dose - Iodine 131, Tritium, and radioactive Material in Particulate Form	Programmatic controls are included in 6.8.4.g.5 and g.9. Existing specification procedural details are relocated to the ODCM.
3/4.11.2.4	Gaseous Effluents: Gaseous Radwaste Treatment or Ventilation Exhaust Treatment System	Programmatic controls are included in 6.8.4.g.6. Existing specification procedural details are relocated to the ODCM.
3/4.11.2.5	Explosive Gas Mixture	Existing specification requirements are retained in the TSs.
N.A. ⁽²⁾	Gas Storage Tanks	Existing specification requirements are retained in the TSs.
N.A.	Main Condenser (BWR)	Existing specification requirements are retained in the TSs.
N.A.	Purging and Venting (BWR Mark II Containments)	Programmatic controls are included in 6.8.4.g.10. Existing specification procedural details are relocated to the ODCM.
3/3.11.3	Solid Radioactive Wastes	Existing specification procedural details are relocated to the PCP.
3/4.11.4	Radioactive Effluents: Total Dose	Programmatic controls are included in 6.8.4.g.11. Existing specification procedural details are relocated to the ODCM.
3/4.12.1	Radiological Environmental Monitoring: Monitoring Program	Programmatic controls are included in 6.8.4.h.1. Existing specification procedural details are relocated to the ODCM.
3/4.12.2	Radiological Environmental Monitoring: Land Use Census	Programmatic controls are included in 6.8.4.h.2. Existing specification procedural details are relocated to the ODCM.

Specification ⁽¹⁾	Subject	Disposition per GL 89-10
3/4.12.3	Radiological Environmental Monitoring: Interlaboratory Comparison Program	Programmatic controls are included in 6.8.4.h.3. Existing specification procedural details are relocated to the ODCM.
5.1.3	Design Features: Site - Map Defining Unrestricted Areas and Site Boundary for Radioactive Gaseous and Liquid Effluents	Existing specification requirements are retained in the TSs.
6.8.4.g	Procedures and Programs: Radioactive Effluent Controls	Specification wording is provided in the GL.
6.8.4.h	Procedures and Programs: Radiological Environmental Monitoring	Specification wording is provided in the GL.
6.9.1.7	Reporting Requirements: Annual Radiological Environmental Operating Report	Specification is simplified and existing reporting details are relocated to the ODCM.
6.9.1.8	Reporting requirements: Semi-annual Radioactive Effluents release Report	Specification is simplified and existing reporting details are relocated to the ODCM or PCP, as appropriate.
6.10	Record Retention	Specification wording is provided in the GL.
6.13	Process Control program	Specification requirements are simplified.
6.14	Offsite Dose Calculation Manual	Specification requirements are simplified.
6.15	Major Changes to Liquid, Gaseous, and Solid Radwaste treatment Systems	Existing procedural details are relocated to the ODCM or PCP, as appropriate.

Note (1): The specification numbers listed in the table are from the Salem Technical Specifications and are not those listed in Enclosure 2 to the GL.

Note (2): The acronym N.A. means the specification is not in the Salem 1/2 Technical Specifications. In two cases, this is because the specification is for boiling water reactors (BWRs) and Salem 1/2 are pressurized water reactors.

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