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James Knubel
Senior Vice President and
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August 16, 2000
JPN-00-030

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington, DC 20555

**SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Proposed Amendment to the Technical Specifications
6.0, Administrative Controls and Radiological Effluent
Technical Specifications (RETS) 3.7, "Offgas Treatment
System Explosive Gas Mixture Instrumentation" (JPTS-99-009)**

This application for amendment to the James A. FitzPatrick's Technical Specifications proposes to: (1) remove "Offgas Treatment System Explosive Gas Mixture Instrumentation", Specification 3.7, from the Radiological Effluent Technical Specifications (RETS) contained in Appendix B and include reference to the Offgas Treatment System Explosive Gas Monitoring Program in Administrative Section 6 to the Technical Specifications contained in Appendix A; (2) replace the position title of Radiological and Environmental Services Manager, contained in the Administrative Section 6 of Appendix A, with radiation protection manager; and (3) revise Plant Staff organization requirements contained in Administrative Section 6 to require either the Operations Manager or Assistant Operations Manager hold an SRO license.

The specifications for Offgas Treatment System Explosive Gas Mixture Instrumentation do not meet any of the screening criteria for retention in the Technical Specifications contained in Code of Federal Regulation 10 CFR 50.36 (c) (2) (ii). The removal of specifications 3.7 from RETS and the inclusion of the Offgas Treatment System Explosive Gas Monitoring Program into Technical Specifications Section 6 of Appendix A is consistent with NUREG-1433, Revision 1, "Standard Technical Specifications - General Electric Plants, BWR/4."

The position title change of the Radiological and Environmental Services Manager to radiation protection manager, and the SRO license retention requirement change from both the Operations Manager and Assistant Operations Manager to either the Operations Manager or Assistant Operations Manager is consistent with Improved Standard Technical Specifications.

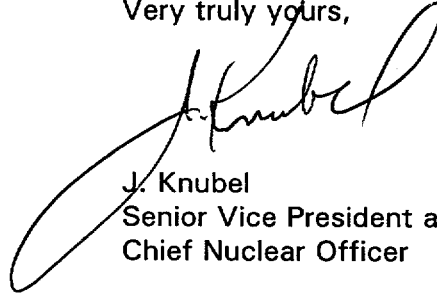
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The signed original of the Application for Amendment to the Operating License is enclosed for filing. Attachment I contains the proposed new Technical Specification pages. Attachment II contains a description of the changes and the Safety Evaluation for the proposed changes. Attachment III contains a mark-up of the affected Technical Specification pages. Attachment IV contains commitments required for implementation.

A copy of this application and the associated attachments are being provided to the designated New York State official in accordance with 10 CFR 50.91.

There is one commitment made by the Authority in this letter. If you have any questions, please contact
Ms. C.D. Faison.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. Knubel', with a large, sweeping loop at the end.

J. Knubel
Senior Vice President and
Chief Nuclear Officer

cc: Next page

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**BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION**

In the Matter of)
NEW YORK POWER AUTHORITY) Docket No. 50-333
James A. FitzPatrick Nuclear Power Plant)

APPLICATION FOR AMENDMENT TO OPERATING LICENSE

The New York Power Authority requests an amendment to the Technical Specifications (TS) contained in Appendix A and Appendix B to Facility License DPR-59 for the James A. FitzPatrick Nuclear Power Plant. This application is filed in accordance with Section 10 CFR 50.90 of the Nuclear Regulatory Commission's regulations.

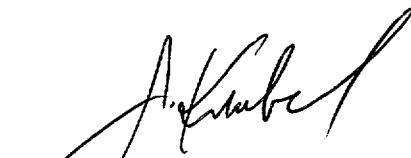
This application for amendment to the James A. FitzPatrick Technical Specifications requests that Section 3.7, "Offgas Treatment System Explosive Gas Mixture Instrumentation" including the associated bases of the Radiological Effluent Technical Specifications (RETS) in Appendix B to the Operating License, be amended as set forth in Attachment II to this application.

Also, this application for amendment requests that Administrative Section 6 of Technical Specifications (TS) in Appendix A to the Operating License be amended as set forth in Attachment II to this application. These changes are consistent with improved Standard Technical Specifications NUREG-1433, Revision 1, "Standard Technical Specifications - General Electric Plants, BWR/4".

Attachments I and II to this application contain the proposed changes to the Technical Specifications and the associated safety evaluation, respectively. A markup of the affected Technical Specification pages is included in Attachment III.

The FitzPatrick Plant Operating Review Committee and Safety Review Committee have reviewed the proposed amendment. A copy of this application for amendment and the associated attachments are being provided to the designated New York officials in accordance with 10 CFR 50.91.

New York Power Authority


J. Knubel
Senior Vice President and
Chief Nuclear officer

STATE OF NEW YORK

COUNTY OF WESTCHESTER

Subscribed and sworn to before me

This 16th day of August, 2000.


NOTARY PUBLIC

EILEEN E. O'CONNOR

Notary Public, State of New York

No. 4991062

Qualified in Westchester County

Commission Expires January 21, 2002

REVISED TECHNICAL SPECIFICATION PAGES

**Proposed Amendment to the Technical Specifications 6.0, Administrative
Controls and Radiological Effluent Technical Specifications (RETS)**

**3.7, "Offgas Treatment System Explosive
Gas Mixture Instrumentation"**

(JPTS-99-009)

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TABLE OF CONTENTS (Cont'd)

6.16	Process Control Program (PCP)	258b
6.17	Offsite Dose Calculation Manual (ODCM)	258b
6.18	Major Modifications to Radioactive Liquid, Gaseous, and Solid Waste Treatment Systems	258c
6.19	Postaccident Sampling Program	258e
6.20	Primary Containment Leakage Rate Testing Program	258e
6.21	Configuration Risk Management Program	258f
6.22	Offgas Treatment System Explosive Gas Monitoring Program	258f
7.0	References	285

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2. An SRO or an SRO with a license limited to fuel handling shall directly supervise all Core Alterations. This person shall have no other duties during this time;
3. DELETED
4. In the event of illness or unexpected absence, up to two (2) hours is allowed to restore the shift crew to the minimum complement.
5. The Operations Manager or Assistant Operations Manager, Shift Manager and Control Room Supervisor shall hold an SRO license and the Senior Nuclear Operator and the Nuclear Control Operator shall hold an RO license or an SRO license.
6. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, health physicists, auxiliary operators, and maintenance personnel who are working on safety-related systems.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8 to 12 hours a day, nominal 40-hour week, while the plant is operating.

However, in the event that unforeseen problems require substantial amounts of overtime to be used or during extended periods of shutdown for refueling, major maintenance or major modifications, on a temporary basis, the following guidelines shall be followed:

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 168 hour period, all excluding shift turnover time.
- c. A break of at least eight hours should be allowed between work periods, shift turnover time can be included in the breaktime.
- d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Site Executive Officer or the General Manager - Operations, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Site Executive Officer or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

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6.3 PLANT STAFF QUALIFICATIONS

- 6.3.1 The minimum qualifications with regard to educational background and experience for plant staff positions shown in FSAR Figure 13.2-7 shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions; except for the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
- 6.3.2 The Shift Technical Advisor (STA) shall meet or exceed the minimum requirements of either Option 1 (Combined SRO/STA Position) or Option 2 (Continued use of STA Position), as defined in the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621). When invoking Option 1, the STA role may be filled by the Shift Manager or Control Room Supervisor. (1)
- 6.3.3 Any deviations will be justified to the NRC prior to an individual's filling of one of these positions.

NOTE:

- (1) The 13 individuals who hold SRO licenses, and have completed the FitzPatrick Advanced Technical Training Program prior to the issuance of License Amendment 111, shall be considered qualified as dual-role SRO/STAs.

6.4 RETRAINING AND REPLACEMENT TRAINING

A training program shall be maintained under the direction of the Training Manager to assure overall proficiency of the plant staff organization. It shall consist of both retraining and replacement training and shall meet or exceed the minimum requirements of Section 5.5 of ANSI N18.1-1971.

The retraining program shall not exceed periods two years in length with a curriculum designed to meet or exceed the requalification requirements of 10 CFR 55.59

6.5 REVIEW AND AUDIT

Review requirements are completed by using designated technical reviewers/qualified safety reviewer and two separate review committees. The Plant Operating Review Committee (PORC) is an onsite review group; the Safety Review Committee (SRC) is an independent offsite review and audit group.

6.5.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

- 6.5.0.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).
- 6.5.0.2 Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two designated technical reviewers who are knowledgeable in the affected functional area.

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6.11 (A) High Radiation Area

1. In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR 20, each High Radiation Area (i.e., ≥ 100 mrem/hr) in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).^{*} Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
 - a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
 - b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
 - c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility health physicist in the Radiation Work Permit.
2. The requirements of 6.11.A.1 above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or the radiation protection manager.

^{*}Radiation protection personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

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6.21 CONFIGURATION RISK MANAGEMENT PROGRAM

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed allowed outage time has been granted. The program is to include the following:

- a. Provisions for the control and implementation of a Level 1 at-power internal events PRA-informed methodology. The assessment is to be capable of evaluating the applicable plant configuration.
- b. Provisions for performing an assessment prior to entering the plant configuration described by the Limiting Conditions for Operation (LCO) Action Statement for preplanned activities.
- c. Provisions for performing an assessment after entering the plant configuration described by the LCO Action Statement for unplanned entry into the LCO Action Statement.
- d. Provisions for assessing the need for additional actions after the discovery of additional equipment-out-of-service conditions while in the plant configuration described by the LCO Action Statement.
- e. Provisions for considering other applicable risk-significant contributors such as Level 2 issues and external events, qualitatively or quantitatively.

6.22 OFFGAS TREATMENT SYSTEM EXPLOSIVE GAS MONITORING PROGRAM

The program provides controls for potentially explosive gas mixtures contained in the Main Condenser Offgas Treatment System.

The program shall include the limits for concentration of hydrogen and oxygen in the Main Condenser Offgas Treatment System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion).

The provisions of Specification 3.0.B and 4.0.C are applicable to the program surveillance frequencies.

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RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

Table of Contents

	<u>Page</u>
1.0 <u>Definitions</u>	1
2.0 <u>Liquid Effluents</u>	3
2.1 Liquid Effluent Monitors	3
2.2 Concentration of Liquid Effluents	6
2.3 Dose from Liquid Effluents	10
2.4 Liquid Radioactive Waste Treatment System Operations	12
2.5 Maximum Activity in Outside Tanks	14
3.0 <u>Gaseous Effluents</u>	17
3.1 Gaseous Effluent Monitors	17
3.2 Gaseous Dose Rates	19
3.3 Air Dose, Noble Gases	24
3.4 Dose Due to Iodine-131, Iodine-133, Tritium and Radionuclides in Particulate Form	26
3.5 Main Condenser Steam Jet Air Ejectors (SJAE)	28
3.6 Offgas Treatment System	30
3.7 Deleted	32
3.8 Standby Gas Treatment System (SBGTS)	34
3.9 Mechanical Vacuum Pump Isolation	35
3.10 Main Control Room Ventilation Radiation Monitor	36
4.0 <u>Solid Radioactive Waste</u>	43
4.1 Process Control Program	43
5.0 <u>Total Dose</u>	46
5.1 Total Dose from Uranium Fuel Cycle	46
6.0 <u>Radiological Environmental Monitoring</u>	51
6.1 Monitoring Program	51
6.2 Land Use Census Program	61
6.3 Interlaboratory Comparison Program	63
7.0 <u>Administrative Controls</u>	66
7.1 Responsibility	66
7.2 Procedures	66
7.3 Reporting Requirements	66

JAFNPP

LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

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LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

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BASES

3.7 Deleted

3.8 STANDBY GAS TREATMENT SYSTEM (SBGTS)

Four radiation monitors are provided which initiate isolation of the reactor building and operating of the SBGTS. The monitors are located as follows: two in the reactor building ventilation exhaust duct and two in refuel floor ventilation exhaust duct. Each pair is considered a separate system. The trip logic consists of any upscale trip on a single monitor or a downscale trip on both monitors in a pair to cause the desired action.

Trip settings for the monitors in the refueling area ventilation exhaust ducts are based upon initiating normal ventilation isolation and SBGTS operation so that most of the activity released during the refueling accident is processed by the SBGTS.

The radiation monitors in the refueling area ventilation duct which initiate building isolation and standby gas treatment operation are arranged in a one out of two logic system. The air ejector offgas monitors are connected in a two out of two logic arrangement. Based on experience with instruments of similar design, a testing interval of once every three months has been found adequate.

3.9 MECHANICAL VACUUM PUMP ISOLATION

3.10 MAIN CONTROL ROOM VENTILATION RADIATION MONITOR

SAFETY EVALUATION

**Proposed Amendment to the Technical Specifications 6.0, Administrative
Controls and Radiological Effluent Technical Specifications (RETS)**

**3.7, "Offgas Treatment System Explosive
Gas Mixture Instrumentation"**

(JPTS-99-009)

SAFETY EVALUATION

Page 1 of 6

I. DESCRIPTION OF THE PROPOSED CHANGES

This application for amendment to the James A. Fitzpatrick Technical Specifications (TS) deletes the Offgas Treatment System Explosive Gas Mixture Instrumentation specification requirements and its Bases from Radiological Effluent Technical Specifications (RETS) located in Appendix B to the Facility License. This amendment also proposes to: (1) add a new paragraph to Technical Specifications Administrative Section 6, located in Appendix A to the Facility License, to identify the administrative process in place for controlling the Offgas Treatment System Explosive Gas Monitoring Program; (2) revise management position title of Radiological and Environmental Services Manager located in Administrative Section 6 of Appendix A to radiation protection manager; and (3) revise the requirement for having both the Operations Manager and Assistance Operation Manager hold an SRO license, to having either the Operations Manager or Assistance Operations Manager hold an SRO license .

A. The specific changes to the TS located in Appendix A are:

Page iv TABLE OF CONTENTS (cont'd)

Add 6.21, Configuration Risk Management Program. This section update was inadvertently omitted with Technical Specifications Amendment No. 253.

Add 6.22, Offgas Treatment System Explosive Gas Monitoring Program.

Page 247a

Section 6.2.2.5, replace "Operations Manager, Assistant Operations Manager, Shift Manager, and Control Room Supervisor shall hold an SRO license" with "Operations Manager or Assistance Operations Manager, and Shift Manager, and Control Room Supervisor shall hold an SRO license".

Page 248

Section 6.3.1, replace Radiological and Environmental Services Manager with radiation protection manager.

Page 256

Section 6.11(A) 2., replace Radiological and Environmental Services Manager with radiation protection manager.

SAFETY EVALUATION

Page 2 of 6

A. (cont.)

Page 258f

Add section 6.22, Offgas Treatment System Explosive Gas Monitoring Program

B. The specific changes to RETS located in Appendix B are:

Page i TABLE OF CONTENTS

Replace:

3.7 Offgas Treatment System Explosive Gas Mixture Instrumentation

With

3.7 DELETED

Page 32

Delete all paragraphs.

Page 33

Delete all paragraphs.

Page 42 Bases

Delete paragraph 3.7

C. Description of Proposed Changes to FitzPatrick Administrative Procedure AP-01.04.

FitzPatrick Administrative Procedure AP-01.04, "Tech Spec Related Requirements, Lists, and Tables" will be revised to include the Offgas Treatment System Explosive Gas Monitoring Program. The Program will include the limits for concentration of hydrogen and oxygen in the Main Condenser Offgas Treatment System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria.

The provisions of TS 3.0.B and 4.0.C will be applicable to the program surveillance frequencies.

SAFETY EVALUATION

Page 3 of 6

II. PURPOSE OF PROPOSED CHANGE

The purposed amendment will remove Section 3.7, "Offgas Treatment System Explosive Gas Mixture Instrumentation" including the associated bases from the Radiological Effluent Technical Specifications (RETS) in Appendix B. This change will include: (a) the incorporation of the Offgas Treatment System Explosive Gas Monitoring Program into an Administrative controlled procedure; and (b) retain Technical Specification requirements for an Offgas Treatment System Explosive Gas Monitoring Program, consistent with Improved Standard Technical Specifications.

This amendment replaces the management position title of Radiological and Environmental Services Manager located in Sections 6.3 and 6.11 of Appendix A with radiation protection manager, consistent with Improved Standard Technical Specifications including Standard Technical Specification Change Traveler TSTF-65, Rev. 1.

This amendment also removes the requirement for both the Operations Manager and the Assistant Operations Manager to hold an SRO license and replaces the requirement with either the Operations Manager or Assistant Operations Manager holds an SRO license. This change is consistent with Improved Standard Technical Specifications including Standard Technical Specification Change Traveler TSTF-65, Rev. 1.

III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGES

The Code of Federal Regulations Part 50.36 (c) (2) (ii) provides criteria for which Technical Specifications must be established. The code further allows those Licensees whose Technical Specifications contain requirements that do not meet those screening criteria for retention as a Technical Specifications, to amend its Technical Specifications and relocate the requirements to another licensee controlled document. The Offgas Treatment System Explosive Gas Mixture Instrumentation Technical Specifications that are proposed to be relocated do not meet the screening criteria of 10 CFR 50.36 and do not constitute performance requirements necessary to ensure safe operation of the facility and therefore do not warrant being in the Technical Specifications.

The proposed changes are administrative in nature since the requirements of the relocated RETS will not be changed at the time of relocation.

SAFETY EVALUATION

Page 4 of 6

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the FitzPatrick plant in accordance with the proposed amendment would not involve a significant hazards consideration as defined in 10 CFR 50.92, since it would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed changes simplify the RETS and meet Code of Federal Regulation requirements as specified in 10 CFR 50.36. Future changes to these requirements will be controlled by 10 CFR 50.59. The proposed changes are administrative in nature and do not involve any modification to any plant equipment or effect plant operation. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of any previously evaluated accident.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated.**

The proposed changes are administrative in nature, do not involve any physical alterations to any plant equipment, and cause no change in the method by which any safety related system performs its function. Therefore, this proposed amendment will not create the possibility of a new or difference kind of accident from any accident previously evaluated.

- (3) Involve a significant reduction in a margin of safety.**

The proposed changes are administrative in nature, will not alter the basic regulatory requirements, and do not affect any safety analyses. Therefore, no margin of safety is reduced as a result of these changes.

Based on the above evaluation, the Authority has concluded that these changes do not involve a significant hazards consideration.

SAFETY EVALUATION

Page 5 of 6

V. IMPLEMENTATION OF THE PROPOSED CHANGE

This amendment request meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) as follows:

- (i) the amendment involves no significant hazards consideration.

As described in Section IV of this evaluation, the proposed changes involve no significant hazards consideration.

- (ii) there is no significant change in the types or significant increase in the amounts of effluents that may be released offsite.

The proposed changes do not alter the margin of safety because the changes do not introduce any new operational modes or physical modifications to the plant. Therefore, there is no change the amounts of effluents which may be released offsite.

- (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes do not alter the margin of safety because the changes do not introduce any new operational mode or physical modifications to the plant. Therefore, there will be no change in individual or cumulative radiation exposure.

Based on the above, the Authority concludes that the proposed changes meet the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.21 relative to requiring a specific environmental assessment by the Commission.

VI. CONCLUSION

Based on the discussions above, this change does not involve a significant hazards consideration, or an unreviewed safety question, and will not endanger the health and safety of the public. The Plant Operating Review Committee (PORC) and Safety Review Committee (SRC) have reviewed this proposed change to the Technical Specifications and agree with this conclusion.

SAFETY EVALUATION

Page 6 of 6

VII. REFERENCES

1. Code of Federal Regulations 10 CFR 50.36, Technical Specifications.

Attachment III to JPN-00-030

MARKUP OF TECHNICAL SPECIFICATION PAGE CHANGES

**Proposed Amendment to the Technical Specifications 6.0, Administrative
Controls and Radiological Effluent Technical Specifications (RETS)**

**3.7, "Offgas Treatment System Explosive
Gas Mixture Instrumentation"**

(JPTS-99-009)

**New York Power Authority
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59**

JAFNPP

TABLE OF CONTENTS (Cont'd)

6.16	Process Control Program (PCP)	258b
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7.0	References	258f
6.21	Confidentiality Risk Management Program	258f
6.22	Offgas Treatment System Explosive Gas Monitoring Program	258f
7.0	References	285

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2. An SRO or an SRO with a license limited to fuel handling shall directly supervise all Core Alterations. This person shall have no other duties during this time;
3. DELETED
4. In the event of illness or unexpected absence, up to two (2) hours is allowed to restore the shift crew to the minimum complement.
5. The Operations Manager, ^{or} Assistant Operations Manager, Shift Manager, and Control Room Supervisor shall hold an SRO license and the Senior Nuclear Operator and the Nuclear Control Operator shall hold an RO license or an SRO license.
6. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, health physicists, auxiliary operators, and maintenance personnel who are working on safety-related systems.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8 to 12 hours a day, nominal 40-hour week, while the plant is operating.

However, in the event that unforeseen problems require substantial amounts of overtime to be used or during extended periods of shutdown for refueling, major maintenance or major modifications, on a temporary basis, the following guidelines shall be followed:

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 168 hour period, all excluding shift turnover time.
- c. A break of at least eight hours should be allowed between work periods, shift turnover time can be included in the breaktime.
- d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Site Executive Officer or the General Manager - Operations, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Site Executive Officer or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

6.3 PLANT STAFF QUALIFICATIONS

- 6.3.1 The minimum qualifications with regard to educational background and experience for plant staff positions shown in FSAR Figure 13.2-7 shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions; except for the ~~Radiological and Environmental Services Manager~~ who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
- 6.3.2 ^{Radiation protection manager} The Shift Technical Advisor (STA) shall meet or exceed the minimum requirements of either Option 1 (Combined SRO/STA Position) or Option 2 (Continued use of STA Position), as defined in the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621). When invoking Option 1, the STA role may be filled by the Shift Manager or Control Room Supervisor. (1)
- 6.3.3 Any deviations will be justified to the NRC prior to an individual's filling of one of these positions.

NOTE:

- (1) The 13 individuals who hold SRO licenses, and have completed the FitzPatrick Advanced Technical Training Program prior to the issuance of License Amendment 111, shall be considered qualified as dual-role SRO/STAs.

6.4 RETRAINING AND REPLACEMENT TRAINING

A training program shall be maintained under the direction of the Training Manager to assure overall proficiency of the plant staff organization. It shall consist of both retraining and replacement training and shall meet or exceed the minimum requirements of Section 5.5 of ANSI N18.1-1971.

The retraining program shall not exceed periods two years in length with a curriculum designed to meet or exceed the requalification requirements of 10 CFR 55.59

6.5 REVIEW AND AUDIT

Review requirements are completed by using designated technical reviewers/qualified safety reviewer and two separate review committees. The Plant Operating Review Committee (PORC) is an onsite review group; the Safety Review Committee (SRC) is an independent offsite review and audit group.

6.5.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

- 6.5.0.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).
- 6.5.0.2 Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two designated technical reviewers who are knowledgeable in the affected functional area.

6.11 (A) High Radiation Area

1. In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR 20, each High Radiation Area (i.e., ≥ 100 mrem/hr) in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).^{*} Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
 - a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
 - b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
 - c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility health physicist in the Radiation Work Permit.
2. The requirements of 6.11.A.1 above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or the Radiological and Environmental Services Manager.

radiation protection manager.

^{*}Radiation Protection personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

6.21 CONFIGURATION RISK MANAGEMENT PROGRAM

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed allowed outage time has been granted. The program is to include the following:

- a. Provisions for the control and implementation of a Level 1 at-power internal events PRA-informed methodology. The assessment is to be capable of evaluating the applicable plant configuration.
- b. Provisions for performing an assessment prior to entering the plant configuration described by the Limiting Conditions for Operation (LCO) Action Statement for preplanned activities.
- c. Provisions for performing an assessment after entering the plant configuration described by the LCO Action Statement for unplanned entry into the LCO Action Statement.
- d. Provisions for assessing the need for additional actions after the discovery of additional equipment-out-of-service conditions while in the plant configuration described by the LCO Action Statement.
- e. Provisions for considering other applicable risk-significant contributors such as Level 2 issues and external events, qualitatively or quantitatively.

6.22 OFFGAS TREATMENT SYSTEM EXPLOSIVE GAS MONITORING PROGRAM

The program provides controls for potentially explosive gas mixtures contained in the Main Condenser Offgas Treatment System.

The program shall include the limits for concentration of hydrogen and oxygen in the Main Condenser Offgas Treatment System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion).

The provisions of Specification 3.0.B and 4.0.C are applicable to the program surveillance frequencies.

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

Table of Contents

	<u>Page</u>
1.0 <u>Definitions</u>	1
2.0 <u>Liquid Effluents</u>	3
2.1 Liquid Effluent Monitors	3
2.2 Concentration of Liquid Effluents	6
2.3 Dose from Liquid Effluents	10
2.4 Liquid Radioactive Waste Treatment System Operations	12
2.5 Maximum Activity in Outside Tanks	14
3.0 <u>Gaseous Effluents</u>	17
3.1 Gaseous Effluent Monitors	17
3.2 Gaseous Dose Rates	19
3.3 Air Dose, Noble Gases	24
3.4 Dose Due to Iodine-131, Iodine-133, Tritium and Radionuclides in Particulate Form	26
3.5 Main Condenser Steam Jet Air Ejectors (SJAE)	28
3.6 Offgas Treatment System	30
3.7 Offgas Treatment System Explosive Gas Mixture Instrumentation	32
3.8 Standby Gas Treatment System (SBGTS)	34
3.9 Mechanical Vacuum Pump Isolation	35
3.10 Main Control Room Ventilation Radiation Monitor	36
4.0 <u>Solid Radioactive Waste</u>	43
4.1 Process Control Program	43
5.0 <u>Total Dose</u>	46
5.1 Total Dose from Uranium Fuel Cycle	46
6.0 <u>Radiological Environmental Monitoring</u>	51
6.1 Monitoring Program	51
6.2 Land Use Census Program	61
6.3 Interlaboratory Comparison Program	63
7.0 <u>Administrative Controls</u>	66
7.1 Responsibility	66
7.2 Procedures	66
7.3 Reporting Requirements	66

DELETED

LIMITING CONDITIONS FOR OPERATION

3.7 OFFGAS TREATMENT SYSTEM EXPLOSIVE GAS MIXTURE INSTRUMENTATION**Applicability**

Applies to the condenser offgas treatment system recombiner operation.

Objective

To ensure proper conditions for the offgas recombiner to operate at design efficiency in order to prevent an explosive mixture of gases in the charcoal treatment system.

Specifications

- a. The concentration of either hydrogen or oxygen in the main condenser offgas treatment system shall be limited to less than or equal to 4% by volume.
- b. In lieu of continuous hydrogen or oxygen monitoring, the following instrumentation shall be operational and capable of providing automatic isolation of the offgas

SURVEILLANCE REQUIREMENTS

3.7 OFFGAS TREATMENT SYSTEM EXPLOSIVE GAS MIXTURE INSTRUMENTATION**Applicability**

Applies to the offgas treatment system instrumentation, which monitors the critical operating parameters of the primary recombiner.

Objective

To ensure that instrumentation required for automatic isolation is maintained and calibrated.

Specifications

- a. The concentration of either hydrogen or oxygen in the main condenser offgas treatment system shall be determined to be within the limits of Specification 3.7.a by continuously monitoring the waste gases in the main condenser offgas treatment system whenever the main condenser evacuation system is in operation with the hydrogen or oxygen monitors. Operation of the hydrogen or oxygen monitors shall be verified in accordance with Specification 3.7.b.1 and 3.7.b.4.
- b. Whenever continuous hydrogen or oxygen monitoring is not available, operation of the explosive gas mixture instruments listed in Specification 3.7.b shall be verified.

LIMITING CONDITIONS FOR OPERATION

treatment system under the following conditions:

1. The offgas dilution steam flow instrumentation shall alarm and automatically isolate the offgas recombiner system at a low flow setpoint greater than or equal to 6300 pounds per hour and at a high flow setpoint less than or equal to 7900 pounds per hour.
 2. The offgas recombiner inlet temperature sensor shall alarm and automatically isolate the offgas recombiner system at a temperature setpoint of greater than or equal to 125°C.
 3. The offgas recombiner outlet temperature sensor shall alarm and automatically isolate the offgas treatment system at a temperature setpoint of greater than or equal to 150°C.
- c. In lieu of continuous hydrogen or oxygen monitoring, the condenser offgas treatment system recombiner effluent shall be analyzed to verify that it contains less than or equal to 4% hydrogen by volume.
- d. With the requirements of the above specifications not satisfied, restore the recombiner system to within operating specifications or suspend use of the charcoal treatment system within 48 hours.

SURVEILLANCE REQUIREMENTS

1. An instrument check shall be performed daily when the offgas treatment system is in operation.
 2. An instrument channel functional test of the instrumentation listed in Specification 3.7.b shall be performed once per 24 months.
 3. An instrument channel calibration of the instrumentation listed in Specification 3.7.b shall be performed once per 24 months.
 4. An instrument channel functional test and calibration of the off-gas hydrogen or oxygen monitors shall be performed once every 3 months.
- c. With condenser offgas treatment system recombiner in service, in lieu of continuous hydrogen or oxygen monitoring, the hydrogen content shall be verified weekly to be less than or equal to 4 % by volume.
- In the event that the hydrogen content cannot be verified, operation of this system may continue for up to 14 days.

3.7 Deleted

BASES

3.7 OFFGAS TREATMENT SYSTEM EXPLOSIVE GAS MIXTURE INSTRUMENTATION

This specification is provided to ensure that the concentration of potentially explosive gas mixtures contained in portions of the offgas treatment system not designed to withstand a hydrogen explosion is maintained below the lower explosive limit of hydrogen. Operation of the offgas recombiner system ensures that the concentration of hydrogen in the offgas charcoal filters remains below combustible levels.

Thus it provides assurance that the releases of radioactive materials will be controlled in conformance with the requirements of 10 CFR 50, Appendix A, General Design Criterion 60. The low steam flow trip point is based on 92% of design steam flow and reroutes the offgas to prevent overheating or ignition of the recombiner catalyst. The high steam flow trip point isolates the recombiner on excess steam flow that may be associated with a pipe break downstream of the recombiner.

3.8 STANDBY GAS TREATMENT SYSTEM (SBGTS)

Four radiation monitors are provided which initiate isolation of the reactor building and operating of the SBGTS. The monitors are located as follows: two in the reactor building ventilation exhaust duct and two in refuel floor ventilation exhaust duct. Each pair is considered a separate system. The trip logic consists of any upscale trip on a single monitor or a downscale trip on both monitors in a pair to cause the desired action.

Trip settings for the monitors in the refueling area ventilation exhaust ducts are based upon initiating normal ventilation isolation and SBGTS operation so that most of the activity released during the refueling accident is processed by the SBGTS.

The radiation monitors in the refueling area ventilation duct which initiate building isolation and standby gas treatment operation are arranged in a one out of two logic system. The air ejector offgas monitors are connected in a two out of two logic arrangement. Based on experience with instruments of similar design, a testing interval of once every three months has been found adequate.

3.9 MECHANICAL VACUUM PUMP ISOLATION

3.10 MAIN CONTROL ROOM VENTILATION RADIATION MONITOR

Attachment IV to JPN-00-030

SUMMARY OF COMMITMENTS

**Proposed Amendment to the Technical Specifications 6.0, Administrative
Controls and Radiological Effluent Technical Specifications (RETS)
3.7 "Offgas Treatment System Explosive
Gas Mixture Instrumentation"**

Commitment ID	Description	Due Date
JPN-00-030-01	The operability and surveillance requirements for the Offgas Treatment System explosive gas mixture instrumentation will be relocated to authority controlled procedure.	30 days from NRC approval of technical specification amendment.