July 16, 2003

Mr. P. E. Katz, Vice President
Calvert Cliffs Nuclear Power Plant, Inc.
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2 - AMENDMENT RE: REVISION TO THE ADMINISTRATIVE CONTROLS SECTION OF THE TECHNICAL SPECIFICATIONS (TAC NOS. MB5416 AND MB5417)

Dear Mr. Katz:

The Commission has issued the enclosed Amendment No. 259 to Renewed Facility Operating License No. DPR-53 and Amendment No. 236 to Renewed Facility Operating License No. DPR-69 for the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (CCNPP). These amendments consist of changes to the Technical Specifications (TSs) in response to your application transmitted by letter dated June 11, 2002, as supplemented May 9, 2003, and June 23, 2003.

These amendments revise the CCNPP TS Administrative Controls Section to incorporate six changes previously approved for the Improved Standard Technical Specifications and one administrative change in renumbering pages.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly *Federal Register* notice.

Sincerely,

/RA/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

Enclosures: 1. Amendment No. 259 to DPR-53
2. Amendment No. 236 to DPR-69
3. Safety Evaluation

cc w/encls: See next page

President
Calvert County Board of
Commissioners
175 Main Street
Prince Frederick, MD 20678

James M. Petro, Esquire
Counsel
Constellation Energy Group, Inc.
750 East Pratt Street, 5th floor
Baltimore, MD 21202

Jay E. Silberg, Esquire
Shaw, Pittman, Potts, and Trowbridge
2300 N Street, NW
Washington, DC 20037

Mark Geckle
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

Resident Inspector
U.S. Nuclear Regulatory
Commission
P.O. Box 287
St. Leonard, MD 20685

Mr. Richard I. McLean, Manager
Nuclear Programs
Power Plant Research Program
Maryland Dept. of Natural Resources
Tawes State Office Building, B3
Annapolis, MD 21401

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Kristen A. Burger, Esquire
Maryland People's Counsel
6 St. Paul Centre
Suite 2102
Baltimore, MD 21202-1631

Patricia T. Birnie, Esquire
Co-Director
Maryland Safe Energy Coalition
P.O. Box 33111
Baltimore, MD 21218

Mr. Loren F. Donatell
NRC Technical Training Center
5700 Brainerd Road
Chattanooga, TN 37411-4017

July 16, 2003

Mr. P. E. Katz, Vice President
Calvert Cliffs Nuclear Power Plant, Inc.
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2 - AMENDMENT RE: REVISION TO THE ADMINISTRATIVE CONTROLS SECTION OF THE TECHNICAL SPECIFICATIONS (TAC NOS. MB5416 AND MB5417)

Dear Mr. Katz:

The Commission has issued the enclosed Amendment No. 259 to Renewed Facility Operating License No. DPR-53 and Amendment No. 236 to Renewed Facility Operating License No. DPR-69 for the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (CCNPP). These amendments consist of changes to the Technical Specifications (TSs) in response to your application transmitted by letter dated June 11, 2002, as supplemented May 9, 2003, and June 23, 2003.

These amendments revise the CCNPP TS Administrative Controls Section to incorporate six changes previously approved for the Improved Standard Technical Specifications and one administrative change in renumbering pages.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly *Federal Register* notice.

Sincerely,

/RA/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

Enclosures: 1. Amendment No. 259 to DPR-53
2. Amendment No. 236 to DPR-69
3. Safety Evaluation

cc w/encls: See next page

ADAMS Accession Numbers:
Amendment: ML031330142, TS(s): ML , Package: ML
*Safety Evaluation provided - no significant changes **See previous concurrence

OFFICE	PDI-1/PM	PDI-1/LA	PDI-1/SC	RORP/SC*	IEHB/SC*	SRXB/SC*	OGC
NAME	GVissing	SLittle	RLaufer	RDennig**	KGibson**	FAkstulewicz**	SUttal
DATE	6/30/03	6/30/03	7/11/03	4/15/03	12/26/02	1/9/03	7/8/03

OFFICIAL RECORD COPY

DATED: July 16, 2003

AMENDMENT NO. 259 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-53
CALVERT CLIFFS UNIT 1

AMENDMENT NO. 236 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-69
CALVERT CLIFFS UNIT 2

DISTRIBUTION:
PUBLIC
PDI-1 R/F
RLaufer
SLittle
DSkay
GVissing
OGC
GHill (2)
WBeckner
RDennig
FAkstulewicz
KGibson
ACRS
BPlatchek, RI

cc: Plant Service list

CALVERT CLIFFS NUCLEAR POWER PLANT, INC.

DOCKET NO. 50-317

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 259
Renewed License No. DPR-53

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Calvert Cliffs Nuclear Power Plant, Inc. (the licensee) dated June 11, 2002, as supplemented May 9, 2003, and June 23, 2003, 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;

   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 Renewed Facility Operating License No. DPR-53 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 259 , are hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Richard J. Laufer, Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 16, 2003

CALVERT CLIFFS NUCLEAR POWER PLANT, INC.

DOCKET NO. 50-318

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NO. 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 236
Renewed License No. DPR-69

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Calvert Cliffs Nuclear Power Plant, Inc. (the licensee) dated June 11, 2002, as supplemented May 9, 2003, and June 23, 2003, 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;

   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 Renewed Facility Operating License No. DPR-69 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 236, 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 the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Richard J. Laufer, Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 16, 2003

ATTACHMENT TO LICENSE AMENDMENTS

AMENDMENT NO. 259 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-53

AMENDMENT NO. 236 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-69

DOCKET NOS. 50-317 AND 50-318

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

Remove Pages	Insert Pages
iv	iv
v	v
5.0-1	5.1-1
5.0-2	5.2-1
5.0-3	5.2-2
5.0-4	5.2-3
5.0-5	5.2-4
5.0-6	5.3-1
5.0-7	5.4-1
5.0-8	5.5-1
5.0-9	5.5-2
5.0-10	5.5-3
5.0-11	5.5-4
5.0-12	5.5-5
5.0-13	5.5-6
5.0-14	5.5-7
5.0-15	5.5-8
5.0-16	5.5-9
5.0-17	5.5-10
5.0-18	5.5-11
5.0-19	5.5-12
5.0-20	5.5-13
5.0-21	5.5-14
5.0-22	5.5-15
5.0-23	5.5-16
5.0-24	5.5-17
5,0-25	5.5-18
5.0-26	5.5-19
5.0-27	5.5-20
5.0-28	5.5-21
5,0-29	5.5-22
5.0-30	5.5-23
5.0-31	5.5-24
5.0-32	5.6-1
5.0-33	5.6-2

Remove Pages	Insert Pages
5.0-34	5.6-3
5.0-35	5.6-4
5.0-36	5.6-5
5.0-37	5.6-6
5.0-38	5.6-7
5.0-39	5.6-8
5.0-40	5.6-9
5.0-41	5.6-10

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 259 TO RENEWED

FACILITY OPERATING LICENSE NO. DPR-53

AND AMENDMENT NO. 236 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-69

CALVERT CLIFFS NUCLEAR POWER PLANT, INC.

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-317 AND 50-318

1.0 INTRODUCTION

By application dated June 11, 2002, as supplemented May 9, 2003, and June 23, 2003, Calvert Cliffs Nuclear Power Plant, Inc. (CCNPPI or the licensee) proposed to amend the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (CCNPP) Technical Specifications (TSs) which are modeled after NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants" (STSs), Revision 1. The proposed changes would revise TS Section 5.0, "Administrative Controls," by adopting six industry-proposed STS changes approved by the NRC. These TS Task Force Items (TSTFs) (258, 279, 299, 308, 348, and 363) have been incorporated into STSs, Revision 2. These TSTFs and the related proposed changes (change numbers 1 through 6 as given in the licensee's application) are described below. The licensee also proposed (change 8) to revise a reference to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 20 in TS 5.5.1, "Offsite Dose Calculation Manual," and in TS 5.5.4, "Radioactive Effluents Control Program," for consistency. In accordance with the format of STSs, Revision 2, the licensee has also proposed (change 7) to number the pages in TS Section 5.0 separately for each of the subsections, 5.1 through 5.6. The May 9, 2003, letter provided additional information that clarified the application, did not expand the scope of the application as originally noticed, did not change the initial proposed no significant hazards consideration determination as published in the Federal Register on September 3, 2002 (67 FR 56318). The June 23, 2003, letter withdrew the requested change dealing with clarifying references to 10 CFR Part 20 in the Technical Specifications and did not change the initial proposed no significant hazards consideration determination as published in the Federal Register on September 3, 2002 (67 FR 56318).

TSTF No.	Description of Changes to NUREG-1432 (STSs), Revision 1	Previous or Proposed Disposition in Calvert Cliffs TSs (Change No.)
258 Rev. 4 Part 1	STS 5.2.2, Unit Staff a) Deleted item b, requirements for presence of licensed operators in the	TS 5.2.2, Unit Staff (change 2) a) Corresponding requirements previously deleted in Amendments 227

TSTF No.	Description of Changes to NUREG-1432 (STSs), Revision 1	Previous or Proposed Disposition in Calvert Cliffs TSs (Change No.)
(Note, this TSTF has 5 parts.)	control room with fuel in the reactor vessel, and renumbered items c to g as b to f).	and 201 (improved TS conversion).
	b) Eliminated details for working hour limits from renumbered item d.	b) Previously revised corresponding item e in Amendments 245 and 219.
	c) Clarified the requirements for the Shift Technical Advisor function in renumbered item f.	c) Maintained existing Shift Technical Advisor requirements in corresponding item g.
258 Rev. 4 Part 2	<u>STS 5.3, Unit Staff Qualifications</u>:	<u>TS 5.3, Unit Staff Qualifications</u> (change 2)
	a) Inserted brackets around second sentence in STS 5.3.1.	a) Not proposed for adoption; retaining pre-improved TS licensing basis in TS 5.3.1.
	b) Added STS 5.3.2, to *retain elements required in TS* by 10 CFR 55.4, "Definitions."	b) Not proposed for adoption.
258 Rev. 4 Part 3	<u>STS 5.5.4, Radioactive Effluent Controls Program (RECP)</u>	<u>TS 5.5.4, Radioactive Effluent Controls Program (RECP)</u> (change 2)
	a) Revised 5.5.4.b to reference Appendix B Table 2, Column 2 to 10 CFR 20.1001 - 20.2402.	a) Licensee does not propose to update TS 5.5.4.b, which references obsolete 10 CFR 20 requirements.
	b) Editorial clarification (words in italics) made to 5.5.4.g regarding yearly dose "resulting from radioactive material released in gaseous effluents *from the site* to areas *at or* beyond the site boundary *shall be in accordance with the following*:"	b) Proposed for adoption in corresponding TS 5.5.4.i, except for phrase "*shall be in accordance with the following*:"; current TS 5.5.4.i uses "to be limited:"
	c) Replaced reference to 10 CFR 20 in 5.5.4.g with explicit dose rates in STS 5.5.4.g.1 and 5.5.4.g.2.	c) Not proposed for adoption; in corresponding TS 5.5.4.i.2, it is proposed to retain the explicit dose rate limits of pre-improved TSs, which omit reference to Iodine-133 and tritium.

TSTF No.	Description of Changes to NUREG-1432 (STSs), Revision 1	Previous or Proposed Disposition in Calvert Cliffs TSs (Change No.)
	d) New provision in 5.5.4.g.1 uses term "whole body" instead of "total body."	d) Not proposed for adoption; Corresponding TS 5.5.4.i.1 retains use of term "total body."
	e) Editorial clarification (words in italics) made to 5.5.4.j regarding the annual dose or dose commitment to any member of the public, *beyond the site boundary*, due to releases of radioactivity . . ."	e) Addition of the words *beyond the site boundary* is a part of current proposal in corresponding TS 5.5.4.l.
	f) Added statement at the end of 5.5.4 to specify that the provisions of SR 3.0.2 and SR 3.0.3 are applicable to the RECP surveillance frequency.	f) Addition of the SR 3.0.2 and SR 3.0.3 applicability statement is a part of currrent proposal.
258 Rev. 4 Part 4	<u>STS 5.6.4, Monthly Operating Reports</u> Revised STS 5.6.4 to be consistent with Generic Letter 97-04 by removing requirement to provide the NRC with documentation of all challenges to the pressurizer power operated relief valves (PORVs) or pressurizer safety valves(SRVs)).	<u>TS 5.6.6 PORV and SRV Report</u> (change 2) Deletion of annual reporting requirement for PORV and SRV challenges and failures is included in current proposal.
258 Rev. 4 Part 5	Revised STS Section 5.7 in accordance with 10 CFR 20.1601(c) regarding alternative methods for controlling access to high radiation areas.	(change 2) Not applicable because the Calvert Cliffs TSs do not contain specifications regarding access to high radiation areas.
Not Applicable	Note: STS 5.5.1 item a.2 (under "Licensee initiated changes to the ODCM:") and STS 5.5.4.c both reference 10 CFR 20.1302; Calvert Cliffs current TSs match STSs.	(change 8) Proposal to replace reference to 10 CFR 20.1302 with reference to superceded 10 CFR 20.106 in corresponding TS 5.5.1.c.1.ii and TS 5.5.4.c. (Not approved; see Section 3.7 of this safety evaluation.)
279 Rev. 0	<u>STS 5.5.7, Inservice Testing Program</u>	<u>TS 5.5.8, Inservice Testing Program</u> (change 4)

TSTF No.	Description of Changes to NUREG-1432 (STSs), Revision 1	Previous or Proposed Disposition in Calvert Cliffs TSs (Change No.)
	Removed reference to "applicable supports."	Removal of reference to "applicable supports" is included in current proposal.
299 Rev. 0	STS 5.5.2, Primary Coolant Sources Outside Containment	TS 5.5.2, Primary Coolant Sources Outside Containment (change 1)
	a) Clarified meaning of "refueling cycle interval" for system integrated leak tests in STS 5.5.2.b.	a) Replacement of "at refueling cycle intervals or less" with "at least once per 24 months" in TS 5.5.2.b is included in current proposal.
	b) Added statement at the end of STS 5.5.2 to specify that "the provisions of SR 3.0.2 are applicable" to system integrated leak test intervals.	b) Addition of SR 3.0.2 applicability statement at the end of TS 5.5.2 is included in current proposal.
308 Rev. 1	STS 5.5.4, Radioactive Effluent Controls Program	TS 5.5.4, Radioactive Effluent Controls Program (change 3)
	Clarified STS 5.5.4.e to specify the intended Generic Letter 89-01 determination requirements for cumulative and projected dose contributions.	Clarification of TS 5.5.4.e is included in current proposal.
348 Rev. 0	STS 5.6.2, Annual Radiological Environmental Operating Report	TS 5.6.2, Annual Radiological Environmental Operating Report (change 5)
	Deleted reference to collocated dosimeters to reflect cancellation of the NRC environmental monitoring program with States.	Deletion of reference to collocated dosimeters is included in current proposal.
363 Rev. 0	STS 5.6.5, Core Operating Limits Report (COLR)	TS 5.6.5, Core Operating Limits Report (COLR) (change 6)
	Revised bracketed paragraph in STS 5.6.5.b to reduce level of detail in citations of topical reports in the TSs, and to require full citations of topical	Removal of details other than topical report number and title from the list of documents describing the NRC approved analytical methods for

TSTF No.	Description of Changes to NUREG-1432 (STSs), Revision 1	Previous or Proposed Disposition in Calvert Cliffs TSs (Change No.)
	reports in the COLR.	determining core operating limits in TS 5.6.5.b is included in current proposal.

2.0 REGULATORY EVALUATION

Since Revision 1 of the STSs was published in 1995, industry and Nuclear Regulatory Commission (NRC) staff have identified additional STS improvements (referred to by TSTF number). Following industry acceptance and NRC staff approval, the NRC incorporated each TSTF into the STSs. In most cases, these changes are generally applicable to Combustion Engineering (CE) designed plants, and may be adopted by individual CE licensees for improving existing TSs, subject to plant-specific findings of applicability and an adequate safety basis. In June 2001, the NRC published Revision 2 of the STSs, which incorporated all approved TSTF changes that had been made to Revision 1. Since then, additional TSTFs have been approved and incorporated into Revision 2.

Although each approved TSTF proposal (called a traveler) should contain an acceptable safety basis for the associated changes to the STSs, the NRC staff did not, prior to 2002, prepare a formal safety evaluation (SE) of the traveler to accompany the staff's approval letter to the Nuclear Energy Institute (NEI). This was consistent with the development of the STSs themselves. The staff also did not prepare SEs for the STSs, which were published as NUREGs, because they are considered to be guidance documents and are not of themselves legally binding on Part 50 licensees. (The generic acceptability of the model specifications in the STSs, however, is documented in the much expanded and improved Bases for the STSs.) Consequently, a licensee applying to incorporate a TSTF into its TSs must provide a plant-specific justification acceptable to the staff. If another licensee subsequently finds that this safety basis is applicable to its facility, it may choose to rely on it to justify adopting the same TSTF. In practice, the SE accompanying the license amendment for the first plant to adopt a particular TSTF establishes a baseline safety basis for the TSTF. Beginning in 2002, the staff revised its TSTF review and approval process to require preparation of a formal staff SE to support the approval of each new acceptable TSTF proposal. Providing a model SE with the NRC's approval of a TSTF streamlines the license amendment process for plants adopting the TSTF, by establishing a generally applicable and acceptable baseline safety basis that licensees can use to justify adoption of the TSTF, consistent with any pertinent plant-specific considerations.

This SE addresses the adoption of TSTF Nos. 258, 279, 299, 308, 348, and 363, which were approved by the staff prior to 2002. However, other facilities have previously adopted these TSTFs, except for TSTF-308; thus, previous SEs have already established the baseline safety bases for all but one of these TSTFs. The present application proposes a number of deviations from the changes contained in these TSTFs, as noted in Section 1.0. Consequently, this SE supplements the baseline safety basis by evaluating proposed deviations from these TSTFs.

The NRC staff finds that the licensee identified in its submittal the applicable regulatory requirements. In addition to the above regulatory requirements and guidance, the staff based its acceptance criteria on:

- Calvert Cliffs final safety analysis report (FSAR)

- The model TSs contained in the improved standard technical specifications (STSs), NUREG-1432, Revision 2, "Standard Technical Specifications, Combustion Engineering Plants;" Sections:

  5.5.1 Offsite Dose Calculation Manual (ODCM)
  5.5.2 Primary Coolant Sources Outside Containment
  5.5.4 Radioactive Effluent Controls Program
  5.5.7 Inservice Testing Program
  5.6.2 Annual Radiological Environmental Operating Report
  5.6.5 Core Operating Limits Report (COLR)

- Generic Letter (GL) 89-01, "Implementation of Programmatic Controls For Radiological Effluent Technical Specifications (RETS) 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"

- NUREG-0133, "Preparation of Radiological Effluent Technical Specifications For Nuclear Power Plants"

- NUREG-1301, "Offsite Dose Calculation Manual Guidance"

3.0 TECHNICAL EVALUATION

The NRC staff approved Calvert Cliffs' application to adopt improved TSs (ITSs) on May 4, 1998. The Calvert Cliffs ITSs were based on the model specifications in Revision 1 of the STSs, and on Calvert Cliffs' previous TSs, plant design, and licensing bases. In this application, the licensee has proposed to adopt six changes that were made to Revision 1 of the STSs since Calvert Cliffs adopted the ITSs.

3.1 Adoption of TSTF-258, Revision 4

As noted in Section 1, the changes in TSTF 258 were in five parts.

3.1.1 TSTF 258 Part 1

This part contained the following three changes to STS 5.2.2, Unit Staff:

3.1.1.a) Deleted the requirements of STS 5.2.2.b regarding the presence of licensed operators in the control room with fuel in the reactor vessel, and renumbered items c to g as b to f).

This change is acceptable because the requirements of 10 CFR 50.54(m)(2)(iii) and 50.54(k) adequately provide for shift manning. The removed requirements will be met through compliance with these regulations and, therefore, are not required to be reiterated in TSs.

3.1.1.b) Eliminated details for working hour limits from renumbered STS 5.2.2.d.

This change replaced specific working hour limits with administrative procedures to control working hours. Specific working hour limits are not required to be in the TSs under 10 CFR 50.36(c)(5). In practice, specific controls for working hours of reactor plant staff are described in plant procedures that require a deliberate decision-making process to minimize the potential for impaired personnel performance. Each licensee's established procedure control processes will provide sufficient control for changes to such procedures. This change will provide reasonable assurance that impaired performance caused by excessive working hours will not jeopardize safe plant operation.

Additionally, this change deletes the statement "Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the [Plant Superintendent] or his designee to ensure that excessive hours have not been assigned." There is no guidance in GL 82-12, "Nuclear Power Plant Staff Working Hours," that discusses these additional controls. Further, the requirement to have the Plant Manager (or his designee) review individual overtime on a monthly basis is unnecessary because existing administrative controls and policies, as well as the monitoring role of an individual's supervisors, are sufficient to prevent excessive use or abuse of overtime.

3.1.1.c) Clarified the requirements for the Shift Technical Advisor (STA) function in renumbered STS 5.2.2 f.

This change eliminated the title of "Shift Technical Advisor (STA)." STAs are not used at all plants; it is permissible for one of the other on-shift individuals fulfill the STA function. Removing the term "STA" removes the unintended implication that the STA and the shift supervisor must be different individuals. Option 1 of the Commission Policy Statement on Engineering Expertise on Shift is satisfied by assigning an individual with specified educational qualifications to each operating crew as one of the senior reactor operators (SROs) (preferably the shift supervisor) required by 10 CFR 50.54(m)(2)(i) to provide the technical expertise on shift. However, the phrasing of the statement, "the STA shall provide ... support to the Shift Supervisor...", could be easily misinterpreted to require separate individuals. Therefore, the wording is revised so that the STA function may be provided by either a separate individual or the individual who also fulfills another role in the shift command structure. This change only clarifies the existing requirements for the STA function. Therefore, it is an administrative change and is acceptable.

The licensee proposed no changes to corresponding TS 5.2.2 in the present application. Calvert Cliffs has previously adopted the first two of these changes. And, at the time of its adoption of the ITS, the licensee chose to retain its pre-ITS licensing basis for STA requirements in corresponding TS 5.2.2.g; hence the licensee also does not propose to adopt the third change. The staff concurs with its previous conclusions in Amendments 227 and 245 for Unit 1 and Amendments 201 and 219 for Unit 2, that current TS 5.2.2 is acceptable.

3.1.2 TSTF 258 Part 2

This part contained the following changes to STS 5.3, Unit Staff Qualifications:

3.1.2.a) Inserted brackets around second sentence in STS 5.3.1.

In Revision 1 of STS 5.3.1, the second sentence addresses qualifications of unit staff not covered by the regulatory guidance and industry standards cited in the first sentence. In the second sentence, as in the first sentence, only citations of regulatory guidance and industry standards were bracketed. However, there may be cases were the entire unit staff are covered by the standards specified in the first sentence, or there may be specific exceptions for specific positions that could then be specified by bracketing the entire sentence. Therefore, this change places brackets around the entire second sentence. This only clarifies that the second sentence is optional and may be omitted if all unit staff position qualifications are covered by the first sentence. Of course, licensees must include this sentence, consistent with existing licensing bases, when appropriate. This clarification does not change the intent of STS 5.3.1. Therefore, this change is administrative and is acceptable.

3.1.2.b) Added STS 5.3.2, to retain elements required in TSs by 10 CFR 55.4, "Definitions."

The addition of STS 5.3.2 is based on conforming the STSs to 10 CFR 55.4 "Definitions;" specifically the following definition:

> *Actively performing the functions of an operator or senior operator* means that an individual has a position on the shift crew that requires the individual to be licensed as defined in **technical specifications**, and that the individual carries out and is responsible for the duties covered by that position.

Although the qualifications of a licensed reactor operator (RO) or SRO are adequately defined and explained in regulations and supporting regulatory guidance, the STSs did not specifically state what it means for an individual to be licensed, as implied by the above definition. To address this issue, industry proposed adding the following to STS 5.3:

> 5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).

In that 10 CFR 50.54(m) begins with "A senior operator licensed pursuant to part 55 of this chapter...", adding this statement results in STS 5.3 defining "licensed" to mean licensed as defined in part 55. This statement also clarifies that although other individuals in the onsite staff are required to hold an SRO license (e.g., the operations manager, STS 5.2.2.e), 10 CFR 55.4 refers only to licensed staff assigned to satisfy the shift manning requirements of 10 CFR 50.54(m). Because this clarification changes no requirements, it is only an administrative change. Therefore, it is acceptable.

The licensee proposed no changes to corresponding TS 5.3.1 in the present application. At the time of its adoption of the ITS, the licensee chose to retain its pre-ITS licensing basis for staff qualifications in TS 5.3.1; hence, the licensee does not propose any modifications related to the first change. The licensee also did not propose to adopt STS 5.3.2. As this provision changed no existing requirements, but only clarified the minimum qualifications required of licensed operators, it is acceptable to not include it in TS 5.3. The staff concurs with its previous conclusion in Amendment 227 for Unit 1 and Amendment 201 for Unit 2, that current TS 5.3.1 is acceptable.

3.1.3 TSTF 258 Part 3

This part contained the following six changes to STS 5.5.4, Radioactive Effluent Controls Program (RECP):

3.1.3.a) Revised STS 5.5.4.b to restore flexibility of previous requirements, by specifying limits "conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402."

Enclosure 3 to GL 89-01 provided model TSs that satisfied the requirements of 10 CFR 20.106, which was the current applicable regulatory requirement at the time. Contained in these model TSs was the following program element:

> Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2.

In 1991, Part 20 was revised. The STSs, through Revision 1, incorporated the model TSs of GL 89-01 with changes to account for the Part 20 revision. Corresponding program element STS 5.5.4.b was updated by citing 10 CFR Part 20, Appendix B, Table 2, Column 2 (notice Table II was changed to Table 2) of the revised Part 20. However, this was more restrictive because the concentration values in the revised table were based on a dose limit that was a factor of ten smaller than before. 10 CFR 20.1008(c) permitted licensees to retain existing, less restrictive limits by retaining the reference to Table II. In order to retain the existing limits while referencing Table 2, TSTF 258 changed the reference in the first element to "ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402." The revised program element is:

> Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402.

This change was intended to eliminate possible confusion or improper implementation of the revised 10 CFR Part 20 requirements.

Current requirements for the content of TSs concerning radioactive effluents are contained in 10 CFR 50.36a. 10 CFR 50.36a requires licensees to maintain control over radioactive material in gaseous and liquid effluents to unrestricted areas, produced during normal reactor operations, including expected occurrences, to levels that are as low as reasonably achievable (ALARA). For power reactors, Appendix I to 10 CFR Part 50 contains the numerical guidance to meet the ALARA requirement. The dose values specified in Appendix I of 10 CFR Part 50 are small percentages of the implicit limits in the old 10 CFR 20.106 and the explicit limits in 10 CFR 20.1301. As secondary controls, the instantaneous concentration release rates required by this TS were chosen by the staff to help maintain annual average releases of radioactive material in gaseous and liquid effluents to within the dose values specified in Appendix I of 10 CFR Part 50. For the purposes of STS 5.5.4.b, 10 CFR Part 20 is used as a source of reference values only. These TS requirements allow operational flexibility, compatible with considerations of health and safety, which may temporarily result in release rates which, if continued for the calendar quarter, would result in radiation doses higher than

specified in Appendix I of 10 CFR Part 50. However, these releases are within the implicit limits in the old 10 CFR Part 20.106 and the explicit limits in 10 CFR Part 20.1302, which references 10 CFR Part 20 Appendix B concentrations. These referenced concentrations in the old 10 CFR Part 20 are specific values which relate to an annual dose of 500 mrem. The liquid effluent radioactive effluent concentration limits given in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402 are based on an annual dose of 50 mrem total effective dose equivalent. Since an instantaneous release concentration corresponding to a dose rate of 500 mrem/year has been acceptable as a TS limit for liquid effluents, which applies at all times to assure that the values in Appendix I of 10 CFR Part 50 are not likely to be exceeded, it is not necessary to reduce this limit by a factor of 10.

The use of effluent concentration values that are 10 times those listed in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402 will not have a negative impact on the ability to continue to operate within the design objectives in Appendix I to 10 CFR Part 50 and 40 CFR Part 190. Thus, the change to STS 5.5.4.b maintains the same overall level of liquid effluent control while retaining the operational flexibility that exists with TSs under the previous 10 CFR Part 20. This limitation (i.e., less than 10 times the concentration values...) provides reasonable assurance that the levels of radioactive materials in bodies of water in Unrestricted Areas will result in exposures within (1) the Section II.A design objectives of appendix I to 10 CFR Part 50 and (2) restrictions authorized by 10 CFR 20.1301(e).

Based on the above, it is acceptable for the liquid release rate TS, as applied on an instantaneous basis, to be based on 10 times the effluent concentration values given in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402.

Calvert Cliffs did not propose to revise corresponding TS 5.5.4.b because its RECP continues to be based on the limits of 10 CFR Part 20, Appendix B, Table II, Column 2. This is allowed by 10 CFR 20.1008(c), and is, therefore, acceptable.

3.1.3.b) Editorial clarification (words in italics) made to STS 5.5.4.g regarding yearly dose "resulting from radioactive material released in gaseous effluents *from the site* to areas *at or* beyond the site boundary *shall be in accordance with the following*:"

The proposed change is editorial and only clarifies the intent of the existing requirement. Therefore, it is acceptable.

Calvert Cliffs proposed to adopt this change in corresponding TS 5.5.4.i, with one exception. It retained the phrase "*to be limited*" in place of the phrase "*shall be in accordance with the following*." This difference is acceptable because it maintains the existing language. The adopted clarification, which is consistent with TSTF 258, is an administrative change and, therefore, is acceptable.

3.1.3.c) Replaced reference to 10 CFR 20 with explicit dose rates in STS 5.5.4.g.

In Revision 1 of the STSs, specification 5.5.4.g stated:

> Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table 2, Column 1.

TSTF 258 revised this to:

> Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be in accordance with the following:
>
> 1. For noble gases: a dose rate ≤ 500 mrem/yr to the whole body and a dose rate ≤ 3000 mrem/yr to the skin and
>
> 2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days: a dose rate ≤ 1500 mrem/yr to any organ,

This change was proposed in order to retain operational flexibility consistent with 10 CFR Part 50, Appendix I, concurrent with the implementation of the revised 10 CFR Part 20.

The current requirements for the content of the TSs concerning radioactive effluents are contained in 10 CFR 50.36a. Section 10 CFR 50.36a requires licensees to maintain control over radioactive material in gaseous and liquid effluents to unrestricted areas, produced during normal reactor operations, including expected occurrences, to levels that are ALARA. For power reactors, Appendix I to 10 CFR Part 50 contains the numerical guidance to meet the ALARA requirement. The dose values specified in Appendix I of 10 CFR Part 50 are small percentages of the implicit limits in the old 10 CFR 20.106 and the explicit limits in 10 CFR 20.1301. As secondary controls, the instantaneous dose rates required by proposed STS 5.5.4.g were chosen by the staff to help maintain annual average releases of radioactive material in gaseous effluents to within the dose values specified in Appendix I of 10 CFR Part 50. For purpose of the basis of this TS, 10 CFR Part 20 is used as a source of reference values only. Thus, revised STS 5.5.4.g allows operational flexibility, compatible with considerations of health and safety, which may temporarily result in release rates that, if continued for the calendar quarter, would result in radiation doses higher than specified in Appendix I of 10 CFR Part 50. However, these releases are within the limits specified in the old 10 CFR 20.106 and the current 10 CFR 20.1302. This specification, which is based on guidance contained in NUREG-0133, is acceptable as a TS limit for gaseous effluents, which applies at all times as an assurance that the values in Appendix I of 10 CFR Part 50 are not likely to be exceeded. Therefore, this change is acceptable.

Calvert Cliffs did not propose changing corresponding TS 5.5.4.i (except as noted in paragraph 3.1.3.b above, and by italics below), because it already specifies explicit dose rate limits, consistent with the STSs, as follows:

Limitations on the dose rate resulting from radioactive material released in gaseous effluents *from the site* to areas *at or* beyond the site boundary, to be limited:

> 1. For noble gases: Less than or equal to 500 mrems/yr to the total body, and less than or equal to 3000 mrems/yr to the skin; and
>
> 2. For Iodine-131 and all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to 1500 mrems/yr to any organ;

Retaining the existing TS requirement that omits explicit reference to Iodine-133 and tritium, but which is otherwise consistent with the revised STS 5.5.4.g, is acceptable.

3.1.3.d) New provision STS 5.5.4.g.1 uses term “whole body” instead of “total body.”

The noble gas dose rate limit is based on the dosimetry (dose methodology) of International Commission on Radiological Protection 2 (ICRP 2), and the correct term is “whole body” as shown in NUREG-1301, Specification 3.11.2.1, page 45. This change does not alter the meaning of the existing requirement and is, therefore, acceptable.

Calvert Cliffs did not propose to adopt the term “whole body” in corresponding TS 5.5.4.i.1; it will continue to use the existing term “total body” for the noble gas dose rate limit. Retaining the existing TS terminology is acceptable.

3.1.3.e) Editorial clarification (words in italics) made to STS 5.5.4.j regarding the annual dose or dose commitment to any member of the public, *beyond the site boundary*, due to releases of radioactivity . . .”

The proposed change is editorial and only clarifies the intent of the existing requirement. Therefore, it is acceptable.

Calvert Cliffs proposed to adopt this change in corresponding TS 5.5.4.l. The adopted clarification, which is consistent with TSTF 258, is an administrative change and, therefore, is acceptable.

3.1.3.f) Added statement at the end of STS 5.5.4 to specify that the provisions of STS SR 3.0.2 and STS SR 3.0.3 are applicable to the RECP surveillance frequency given in STS 5.5.4.e, as revised (see Section 3.4 below).

The provisions of STS SR 3.0.2 are applied to the RECP surveillance frequencies of STS 5.5.4.e to allow for scheduling flexibility. SR 3.0.2 permits a 25% extension of the interval specified in the Frequency (31 days). Allowing a 25% extension in the frequency of performing the monthly cumulative dose and projected dose calculation for the current quarter/year will have no affect on outcome of the calculations.

The provisions of STS SR 3.0.3 state:

> If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

As applied to the 31-day Frequency of STS 5.5.4.e, STS SR 3.0.3 would allow up to 31 days to complete the surveillance if it is discovered that the surveillance was not performed within 38 days and 18 hours (the specified interval plus the 25% extension). Allowing 31 days to complete the cumulative dose and projected dose calculation for the current quarter/year is

acceptable because it will have no effect on the outcome of the calculations and has no impact on the risk associated with plant operation. In addition, operating experience has shown that the calculated dose is usually well within limits. Thus, it is considered unlikely that a potential interval of at least 68 days and 18 hours between dose calculations will result in inadvertent effluent releases exceeding the specified limits. STS 5.5.4 requires the RECP, which must be contained in the ODCM, to include remedial measures established in the event dose limits are exceeded. Therefore, delaying implementation of these remedial measures for 31 days from the time of discovery of a missed dose calculation is acceptable. In the event the calculations are not completed within the time limits allowed by SR 3.0.2 and SR 3.0.3, these specifications direct the licensee take the RECP remedial measures.

Applying the frequency provisions of SR 3.0.2 and SR 3.0.3 to RECP surveillances is acceptable because it has no impact on the calculations, precludes taking remedial actions unnecessarily, and clarifies the actions to take if the dose calculations cannot be completed within the specified time intervals.

Calvert Cliffs proposed to adopt these provisions in TS 5.5.4, consistent with the STSs. This is acceptable for the reasons given above.

3.1.4 TSTF 258 Part 4

This part of TSTF 258 revised STS 5.6.4 to be consistent with GL 97-04 by removing the requirement to provide the NRC with documentation of all challenges to the pressurizer power operated relief valves (PORVs) or pressurizer safety relief valves (SRVs).

The reporting of pressurizer safety and relief valve failures and challenges is based on the guidance of NUREG-0694, "TMI-Related Requirements for New Operating Licensees." This guidance states: "Assure that any failure of a PORV or safety valve to close will be reported to the NRC promptly. All challenges to the PORVs or safety valves should be documented in the annual report." NRC GL 97-02, "Revised Contents of the Monthly Operating Report," requests the submittal of less information in the monthly operating report. The GL identifies what needs to be reported to support the NRC Performance Indicator Program, and availability and capacity statistics. The GL does not specifically identify the need to report challenges to the pressurizer SRVs. Given that the NRC no longer requires the reporting of this information for the

Performance Indicator Program, it is acceptable to delete the requirement to provide documentation of all challenges to the pressurizer PORVs or SRVs.

Calvert Cliffs proposed to delete the annual reporting requirement for PORV and SRV challenges and failures from TS 5.6.6, “PORV and SRV Report,” consistent with TSTF 258, Rev. 4. This is acceptable for the reasons given above.

3.1.5 TSTF 258 Part 5

This part of TSTF 258 proposed changes to STS Section 5.7 based on the revised 10 CFR Part 20 and the letter from C. Grimes, NRC, to J. Davis, NEI, dated April 9, 1997. Section 20.1601(a) establishes controls for “each entrance or access point to a high radiation area.” Section 20.1601(b) permits “continuous direct or electronic surveillance that is capable of preventing unauthorized entry,” in place of the controls of Section 20.1601(a). And Section

20.1601(c) allows a licensee to use NRC approved "alternative methods" for controlling access to high radiation areas, in place of the controls of Section 20.1601(a). The changes of TSTF 258 update STS Section 5.7 with alternative methods that are consistent with the revised 10 CFR Part 20. These updated alternative methods for controlling access to high radiation areas are acceptable because the staff has concluded they provide a level of control equivalent to that provided by Section 20.1601(a).

Calvert Cliffs does not include high radiation area access controls in its TSs, and does not propose to adopt optional STS 5.7, as would be permitted by 10 CFR 20.1601(c). Reliance on the requirements 10 CFR 20.1601 for controlling access to high radiation areas is acceptable.

3.2 Adoption of TSTF-279, Revision 0

The NRC staff approved TSTF-279, Revision 0, on July 16, 1998. This TSTF revised STS 5.5.8, "Inservice Testing Program" by removing reference to "applicable supports," which are already adequately governed by the inservice inspection program requirements of 10 CFR 50.55a. The staff has previously approved adoption of this TSTF at Grand Gulf in License Amendment 142 on June 30, 2000 (ADAMS Accession No. ML003729556).

The requirements of STS 5.5.8 state:

> This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports.

The inservice inspection (ISI) program addresses pipe supports, not the inservice testing (IST) program. Requirements for ISI are given in 10 CFR 50.55a. Therefore, removal of the reference to pipe supports is an administrative change and is acceptable.

Calvert Cliffs proposed to adopt this TSTF without deviation in corresponding TS 5.5.8. This change is acceptable for the reasons given above.

3.3 Adoption of TSTF-299, Revision 0

The NRC staff approved TSTF-299, Revision 0 on October 10, 2000. This TSTF clarified the meaning of "refueling cycle" for system integrated leak test intervals in STS 5.5.2, "Primary Coolant Sources Outside Containment;" specifically STS 5.5.2.b. It also specified that the provisions of STS SR 3.0.2 are applicable to these test intervals. The staff has previously approved adoption of this TSTF at Vogtle Units 1 and 2 in License Amendments 119 and 97 on May 11, 2001 (ADAMS Accession No. ML011350544).

STS 5.5.2.b requires the program for primary coolant sources outside containment to include integrated leak test requirements for each system with a test interval equal to a "refueling cycle interval or less." This test interval is equivalent to an STS surveillance frequency. Thus, it is appropriate to state it so that it is consistent with most STS surveillance frequencies by replacing "at refueling cycle intervals or less" with "at least once per [18] months." In addition, the provisions of STS SR 3.0.2, which permit the frequency to be extended by 25%, should also apply to this system leak testing to retain existing necessary scheduling flexibility. The TSTF committee stated in the traveler for TSTF 299 that:

> As a result of explicitly stating the interval for the test, it will no longer be possible to account for shutdowns or power reductions that may occur during the cycle in order to satisfy the interval requirements for the test required by STS 5.5.2.b. That is, a refueling cycle may be longer than [18] months in order to achieve the required fuel burnup.

In such case, the proposed statement of the test interval would require the test before the actual fuel cycle was completed. Thus, in order to avoid this consequence of the revised frequency, it is necessary to state that the STS Section 3.0 provision of SR 3.0.2 applies to STS 5.5.2. The revised test interval combined with the provisions of STS SR 3.0.2 is equivalent to the existing requirement, provided the interval between refueling outages is no greater than 22.5 months (18 months plus 25%) for plants on an 18-month fuel cycle. For such cases, this change is administrative and, therefore, acceptable. In the event the current fuel cycle requires more than 22.5 months to complete, because of unanticipated shutdowns and power reductions, the revised test interval would require the test before the completion of the current fuel cycle. This is more restrictive than the current requirement, which would allow delaying the test until the actual end of the fuel cycle. Therefore, because the proposed change is potentially more restrictive, while still maintaining most of the existing scheduling flexibility, it is acceptable.

Calvert Cliffs proposed to adopt this TSTF without deviation in corresponding TS 5.5.2, with a 24-month frequency, which is consistent with the Calvert Cliffs existing 2-year fuel cycle. Therefore, adoption of TSTF 299 is acceptable for the reasons given above.

3.4 Adoption of TSTF-308, Revision 1

The NRC staff approved TSTF-308, Revision 1 on June 27, 2000. This TSTF clarified STS 5.5.4, “Radioactive Effluent Controls Program,” to specify the intended GL 89-01 determination requirements for cumulative and projected dose contributions.
The staff has not previously approved adoption of this TSTF for a licensed facility. One other facility’s application to adopt TSTF 308, is still under staff review. That facility is Susquehanna Steam Electric Station Units 1 and 2.

The NRC staff issued GL 89-01, “Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (RETSs) in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETSs to the Offsite Dose Calculation Manual or to the Process Control Program,” on January 31, 1989. In this GL, the NRC staff informed licensees that programmatic controls can be implemented in the administrative controls section of the TSs to satisfy existing regulatory requirements for RETSs. At the same time, the procedural details of the current TSs on radioactive effluents and radiological environmental monitoring can be relocated to the ODCM. The staff provided GL 89-01 as a line-item improvement of the TSs, consistent with the goals of the Commission's Proposed Policy Statement on Technical Specification Improvements for Nuclear Power Reactors (the Interim Policy Statement on TS Improvements), which was issued on February 6, 1987 (52 FR 3288).

The staff encouraged licensees to propose license amendments to incorporate into the TSs the model specifications in Enclosure 3 to GL 89-01, which satisfies the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50.

Enclosure 3 provided model specifications for programmatic controls for RETSs and its associated reporting requirements. These model specifications replaced various RETS limiting conditions for operation (LCOs) and surveillance requirements (SRs) in the previous standard TSs with programmatic controls in new TS 6.8.4.g, "Radioactive Effluent Controls Program." In particular, TS 6.8.4.g.5 retained the radioactive effluent dose determination and projection requirements from previous standard TS Section 3/4.11, "Radioactive Effluents." These retained requirements are quoted below.

TS 3/4.11.1.2, "Liquid Effluents: Dose"

> 4.11.1.2 Cumulative dose contributions from liquid effluents for the current calendar quarter and the current calendar year shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

TS 3/4.11.1.3, "Liquid Effluents: Liquid Waste Treatment System"

> 4.11.1.3.1 Doses due to liquid releases from each reactor unit to UNRESTRICTED AREAS shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when Liquid Radwaste Treatment Systems are not being fully utilized.

TS 3/4.11.2.2, "Gaseous Effluents: Dose - Noble Gases"

> 4.11.2.2 Cumulative dose contributions for the current calendar quarter and current calendar year for noble gases shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

TS 3/4.11.2.3, "Gaseous Effluents: Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form"

> 4.11.2.3 Cumulative dose contributions for the current calendar quarter and current calendar year for Iodine-131, Iodine-133, tritium and radionuclides in particulate form with half-lives greater than 8 days shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

TS 3/4.11.2.5, "Gaseous Effluents: Ventilation Exhaust Treatment System"

> 4.11.2.5.1 Doses due to gaseous releases from each unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when the Ventilation Exhaust Treatment System is not being fully utilized.

The GL combined these surveillances as a programmatic requirement in previous standard TS 6.8.4.g, "Radioactive Effluent Controls Program," item 5:

> Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days.

The improved STS, through Revision 1, retained the Radioactive Effluent Controls Program requirements of TS 6.8.4.g in STS 5.5.4; in particular, the text of TS 6.8.4.g.5 was retained verbatim in STS 5.5.4.e, until NRC approval of TSTF-308, Revision 1.

The Westinghouse Owners Group proposed TSTF-308 because it was concerned that the text of this specification "can be misinterpreted to require determining projected dose contribution *for the current calendar quarter and current calendar year* every 31 days." The text of the above previous standard TS SRs clearly did not require determining projected dose contributions *for the current calendar quarter and current calendar year* every 31 days (See SRs 4.11.1.3.1 and 4.11.2.5.1 above). Therefore, in TSTF-308, Revision 1, industry proposed clarifying STS 5.5.4.e with the following text, which was suggested by the NRC staff:

> Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days.

These two statements also differ from the language in the previous standard TS SRs and in the STS Revision 1 version of Specification 5.5.4.e by omitting the phrase "and parameters" after the word methodology in the second sentence. This difference is acceptable because it does not change the actual implementation of the projected dose determination, which is addressed in the ODCM. However, including this phrase would also be acceptable for the same reason. Any plant that has adopted TS 6.8.4.g.5, in accordance with GL 89-01, or STS 5.5.4.e (Revision 1 or earlier), should revise its TSs in accordance with TSTF-308, Revision 1, which has been incorporated into STS Revision 2.

When Calvert Cliffs adopted model specification 6.8.4.g.5 of GL 89-01 in pre-ITS Calvert Cliffs TS 6.5.5.e, it adopted the same language as found in STS Revision 1 for specification 5.5.4.e. This requirement was retained in TS 5.5.4.e when Calvert Cliffs adopted the improved TSs in 1998. Calvert Cliffs proposed to revise TS 5.5.4.e by replacing the existing wording with the above language from TSTF-308, Revision 1. This change to Calvert Cliffs TS 5.5.4.e is administrative because it only clarifies the intent of the dose projection requirement by removing a potential for misinterpretation, which was unintentionally introduced when Calvert Cliffs adopted GL 89-01. Therefore, the adoption of TSTF-30, Revision 1, by CCNPP is acceptable.

3.5 Adoption of TSTF-348, Revision 0

The NRC staff approved TSTF-348, Revision 0, on January 7, 2000. This TSTF revised STS 5.6.2, "Annual Radiological Environmental Operating Report," to delete reference to collocated dosimeters to reflect cancellation of the NRC environmental monitoring program with States.

In press release no. 98-08, dated January 13, 1998, the NRC announced that it had ended its contract with 34 States to perform radiation monitoring around certain facilities as of the end of

1997. In Revision 1 of the STS, the last paragraph of Specification 5.6.2, "Annual Radiological Environmental Operating Report" contained the following reporting requirement statement. (Note that TLD stands for thermo-luminescent dosimeter.)

> **[**The report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result.**]**

This statement was bracketed to indicate that it did not apply to facilities that did not participate in this program; i.e., plants that did not have collocated dosimeters. The NRC TLD program referred to by this statement, however, was the same program that the NRC had canceled at the end of 1997. In 1999, industry proposed TSTF-348 to delete this reporting requirement because without a program there would be no program results to report. The NRC staff finds this change is acceptable because without a TLD program with the States, requiring a report documenting the results of such a program is meaningless.

Calvert Cliffs proposed to remove from TS 5.6.2 the same reporting requirement that TSTF-348 had removed from STS 6.5.2. Deleting this reporting requirement is considered an administrative change because there is no longer a TLD program with results to report. Therefore, this change is acceptable.

3.6 Adoption of TSTF-363, Revision 0

The NRC staff approved TSTF-363, Revision 0, on March 21, 2000. This TSTF reduced the level of detail in citations of topical reports in STS 5.6.5, "Core Operating Limits Report (COLR)," and added a requirement for full citations of topical reports in the COLR. The staff has previously approved adoption of this TSTF at Millstone Unit 2 in License Amendment 260 on December 19, 2001. (ADAMS Accession No. ML013190317).

Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications," allowed licensees to implement a COLR to remove certain cycle specific parameters from the TSs. As part of the COLR implementation, the licensees were required to list the analytical methods used to determine the core operating limits, including topical reports, by listing the report number, title, date, and the NRC staff approval document. However, to reduce the burden of having to request an amendment whenever the approved topicals are revised, the industry TSTF committee proposed TSTF-363, "Revise Topical Report References in ITS 5.6.5, COLR," to allow the citation of only the title and number of the topical in the TSs. As part of this change, STS 6.5.6.b is revised by adding a second sentence to the following bracketed requirement:

> **[** Identify the Topical Report(s) by number and title or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).**]**

With this change, the COLR will provide specific information identifying the particular NRC-approved topical reports used to determine the core operating limits for each cycle. This method of referencing topical reports would allow a licensee to use current applicable NRC-

approved topical reports to support limits in the COLR without having to obtain an amendment to the facility operating license every time the topical report is revised. In such cases, a licensee would no longer need to obtain a TS change in order to reload fuel, which would save NRC and licensee resources. This change to STS 5.6.5 is acceptable because the COLR will ensure that each reference to a topical report in STS 5.6.5.b will continue to reflect the applicable NRC-approved revision.

Calvert Cliffs proposed to adopt TSTF 363 without deviation in corresponding TS 5.6.5. This change removes the date from the topical reports listed in TS 5.6.5.b. These references will only contain the title and number of the topical reports used to generate the current core operating limits. As required by TSTF 363, the COLR will include the complete identification; i.e., title, number, and date. Several topical report references in TS 5.6.5.b give the phrase "latest approved revision" instead of or in addition to the revision date. These phrases are also removed from TS 5.6.5.b. However, the COLR includes the actual date of the latest approved revision of each topical as required by TSTF 363. Therefore, it is acceptable for Calvert Cliffs to adopt TSTF 363 for the reasons stated above.

3.7 Proposal to renumber pages of TS Section 5.0. (Change No. 7)

NUREG-1432, Revision 2 recommended that pages of subsections of TSs Section 5.0 be numbered to reflect the appropriate sections of 5.0 (i.e., 5.0-1....5.0-40, 5.1-1, 5.2-1....5.2-4 etc). This is an administrative type change and, therefore, is acceptable.

3.8 Proposal to Reference Old Version of 10 CFR Part 20 (Change No. 8)

STS 5.5.1 item a.2 (under "Licensee initiated changes to the ODCM:") and STS 5.5.4.c (under "Radioactive Effluent Controls Program") both reference 10 CFR 20.1302 as the standard of compliance regarding methods of radioactive effluent controls. Prior to license amendments issued on Oct 18, 1996, the corresponding Calvert Cliffs TSs referenced Section 20.106 of the pre-1991 version of 10 CFR Part 20. That amendment revised Calvert Cliff's radiological TSs based on guidance in GL 89-01 and updated the reference to Part 20 to the current version; i.e., 10 CFR 20.1302. This reference was maintained in the subsequent 1998 adoption of improved TSs 5.5.1.c.1.ii and 5.5.4.c., which are closely based on the STSs.

Although the amendment updated the TSs to reference the latest version of Part 20 in these two specifications, it did not change the reference to the old Part 20 in TS 5.5.4.b, which currently refers to concentration values in 10 CFR Part 20 (Section 20.1-20.602), Appendix B, Table II, Column 2 (see discussion in Section 3.1.3.a) of this SE. In addition, in its submittal, the licensee stated it has not converted its radioactive effluent controls program to conform to the current version of Part 20. In consideration of the inconsistent references to Part 20 noted in current TSs 5.5.1.c.ii, 5.5.4.b, and 5.5.4.c, and the old Part 20 basis of its current RECP, the licensee proposed to replace the references to the current Part 20 (Section 20.1302) with references to the old Part 20 (Section 20.106), as an administrative change to reflect the previous TSs, make the TSs self-consistent, and align the TSs with the existing RECP.

The staff recognizes that the old Part 20 requirements are more restrictive than the current Part 20 requirements. Thus, despite the inconsistency, the existing TSs that reference the current Part 20 requirements are acceptable, even though the Calvert Cliffs RECP conforms to the older more stringent requirements. However, removing the TS inconsistency as proposed by the licensee would be contrary to 10 CFR 20.1008(b), which states:

> The applicable section of §§20.1001-20.2402 must be used in lieu of requirements in the standards for protection against radiation in effect prior to January 1, 1994 (See §§20.1-20.602 codified as of January 1, 1993.) that are cited in license conditions or technical specifications, except as specified in paragraphs (c), (d), and (e) of this section. If the requirements of this part are more restrictive than the existing license condition, then the licensee shall comply with this part unless exempted by paragraph (d) of this section.

In addition, Section 20.1008(c) states:

> Any existing license condition or technical specification that is more restrictive than a requirement in §§20.1001-20.2402 remains in force until there is a technical specification change, license amendment, or license renewal.

The provisions of the second sentence of paragraph (b), and paragraphs (d) and (e) of Section 20.1008 do not apply to Calvert Cliffs because (1) the requirements of the current Part 20 are not more restrictive than the existing license condition, (2) no exemptions to Part 20 requirements in effect prior to January 1, 1994, were granted to Calvert Cliffs, and (3) the Calvert Cliffs operating licenses contain no license conditions that cite provisions in requirements in the standards for protection against radiation in effect prior to January 1, 1994, for which there are no corresponding provisions in the current Part 20.

Paragraph (c) of Section 20.1008 states that pre-1994 Part 20 requirements incorporated in the facility operating license, which are more restrictive than the current Part 20 requirements, remain applicable until the license is amended or renewed. The licensee partially obtained such an amendment when it updated the Part 20 references in its RECP TSs in 1996. In addition, the NRC has approved renewal of the Calvert Cliffs operating licenses. Therefore, paragraph (c) of Section 20.1008 requires the Calvert Cliffs TSs to reflect Sections 20.1001-20.2402.

As discussed in Section 3.1.3.a) of this evaluation, however, paragraph (c) of Section 20.1008 allows maintaining the reference to the concentration values in 10 CFR 20 (Sections 20.1-20.602), Appendix B, Table II, Column 2, in TS 5.5.4.b. On the other hand, the regulation makes no provision for choosing to specify a reference to the old requirements once the TSs have been revised to reference the new requirements. Therefore, the NRC staff cannot approve the proposal to change TSs 5.5.1.c.1.ii and 5.5.4.c to cite Section 20.106 in place of Section 20.1302. The staff discussed this with the licensee and by letter dated June 23, 2003, the licensee withdrew the requested change dealing with clarifying references to 10 CFR Part 20 in the TSs. Further, the licensee indicated that they will consider adopting the wording of TSTF-258, Revision 4 to clarify TS references to 10 CFR Part 20 at some point in the future.

3.9 Conclusion of the Technical Evaluation

The proposed changes to the administrative controls in TS Section 5.0 based on approved STS changes, with certain plant-specific deviations, are administrative in nature, and are, therefore acceptable, with the exception of the proposal to reference Section 20.106 in lieu of Section 20.1302 in TSs 5.5.1 and 5.5.4, which was withdrawn by the licensee by letter dated June 23, 2003.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Maryland 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 (67 FR 56318). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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.

Principal Contributors: C. Harbuck, A. Hayes, S. Klementowicz, S. Peters

Date: July 16, 2003