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DESCRIPTION:

Letter notarized 2-9-76...trans the following...

ENCLOSURES:

Proposed Amdt. # 14 to OL/Change # 66 to the Tech. Specs. Consisting of revisions to Tech. Specs. with regard to clarification of the Spec. and correcting error which currently exist.... W/Attached Section 3.9...

DO NOT REMOVE

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ACKNOWLEDGED

PLANT NAME: Kewaunee

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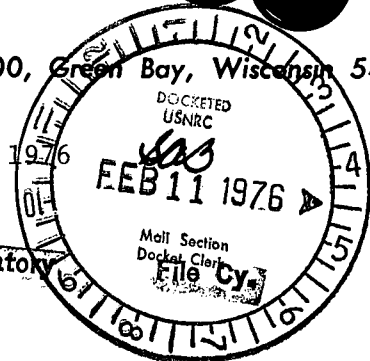
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February 9, 1976

Regulatory

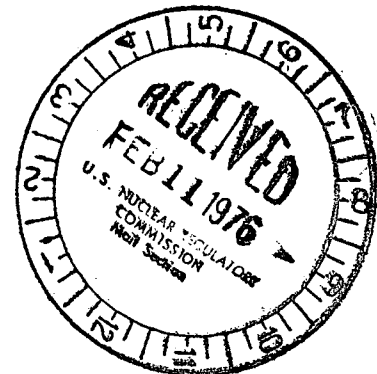


Division of Operating Reactors
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Mr. R. A. Purple, Chief
Operating Reactors Branch #1

Gentlemen:

REF: Docket 50-305
Operating License DPR-43
Proposed Amendment No. 14
Proposed Change No. 6 to the
Kewaunee Nuclear Power Plant
Technical Specifications



Attached are 37 copies of the referenced proposed amendment to the Technical Specifications. These proposed changes do not change, nor are they intended to change, the intent of the specifications; however, these proposed changes do provide clarification of the specifications and correct errors which currently exist. The entire Section 3.9 has been included, although certain pages do not include requested revisions.

The following provides a tabulation of the proposed changes and the associated reason for change:

1. The objective statement on page TS 3.9-1 was altered to remove the discussion of rate as related to Part 20, since Part 20 restricts concentrations and doses, not rates of exposure or release of radioactivity.
2. The objectives a, b and c for liquid wastes noted on page TS 3.9-1 were reworded for clarity.
3. Specification 3.9.a.4 was modified to allow use of other radiation monitors besides R-19, the steam generator blowdown monitor, to monitor the activity of the steam generators. The condenser air ejector monitor would be very responsive to an increase in secondary plant I¹³¹ activity due to a steam generator tube leak. In addition, the steam generator blowdown monitor is not redundant and any failure of that single monitor results in a condition of not being able to conform to the specification.

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4. Specification 3.9.a.5 was modified to remove the 200,000 gpm value for minimum dilution water. Since the specification limits the concentrations and the total yearly release, the 200,000 gpm value results in a needless restriction. The 200,000 gpm minimum dilution flow would prohibit the discharge of water containing very low level radioactivity (satisfying drinking water specifications) from the waste disposal system during a refueling outage when both circulating water pumps could be inoperable due to maintenance activities.
5. The first paragraph on page TS 3.9-5 was modified to correct the reference to Section 6 of the Technical Specifications which were changed by Amendment No. 5 issued 12/18/75.
6. The second sentence of paragraph two on page TS 3.9-5 was modified to clarify the bases, since the specification does not address rate of release.
7. The third paragraph on page TS 3.9-5 was changed to correspond to change 3 above.
8. The equation of specification 3.9.b.1 was altered to correct a mathematical error. Q_i is related to MPC_i , not to $\sum_i MPC_i$.
9. Specification 3.9.b.4.a has been changed to correct the terminology in regards to iodine and particulate activity analyses. The iodine activity analysis is performed by sampling the stack effluent with an activated charcoal canister, followed by gamma spectroscopic examination of that canister. The particulate activity analysis is performed by collecting the particulate on an air filter, followed by a gamma spectroscopic examination of the air filter. This inconsistency of working in the specification to installed equipment described in the FSAR was noted by an Office of I&E Inspector.
10. Specification 3.9.b.4.b was altered because the limits for release concentration are below the sensitivity of the continuous monitors designed to prevent accidental high activity level releases. The installed continuous monitors have similar sensitivities to monitors employed at other facilities in operation and under construction. This inconsistency between installed equipment described in the FSAR and performance requirement per the specification was noted by an Office of I&E Inspector.
11. Specification 3.9.b.5 is modified to allow discharge of very low level gaseous wastes without the 45-day retention period. Low level wastes (below Part 20 Appendix B limits for MPC_i) have been retained for 45 days as required by this specification. Retention of very low level gaseous wastes results in significant limitations on operational flexibility without providing any additional protection to the health and safety of the public.

12. The dispersion factor noted in sentence two of paragraph 1 on page TS 3.9-9 included a typing error. The correct value is 3.6×10^{-6} sec/m³.
13. The third paragraph of page TS 3.9-9 was modified as a result of change 8 above.
14. The equation noted in paragraph four of page TS 3.9-9 and the associated description were corrected to provide additional clarification. The quantity MPC_I is defined in paragraph 3 of page TS 3.9-9 and is a different quantity from that discussed in paragraph 4. The quantity MPC_I was employed to avoid confusion between the two specifications 3.9.b.1 and 3.9.b.2.
15. The change to paragraph 3 of page TS 3.9-10 is related to change 11 above.
16. The section referenced in the last paragraph of page TS 3.9-10 has been changed to Section 6.9 since Amendment 5 to the Technical Specifications issued 12/18/75.
17. The Specification 4.11.a.2 is related to Section 3.9. The wording of 4.11.a.2 is revised to provide clarification of the monitoring requirements as a result of the proposed changes to Section 3.9.
18. The change to item 1 of Table TS 4.1-2 adds fluorine to the required chemistry analyses. The effect of fluorine upon stainless steel is similar to chlorine and, therefore, requires similar monitoring.
19. The change to item 8 of Table TS 4.1-2 corrects the specification. The liquid effluent monitor is an inline monitor which monitors the fluid during the release.
20. In item 9 of Table TS 4.1-2 no analysis is associated with the circulating water monitor. The word analysis was removed from the test column.
21. The containment vessel air particulate monitor noted in item 11 of Table TS 4.1-2 monitors the mixed fission produce particulate activity in the containment atmosphere, not the specified I-131 activity. The revision as noted would correct the specification.
22. The containment vessel radiogas monitor noted in item 12 of Table TS 4.1-2 monitors the mix fission gas inventory of the containment atmosphere and does not differentiate I-131 activity in particular. The revision as noted would correct the specification.

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As presented above, the proposed changes are mainly editorial in nature and provide clarification of the requirements. We do not believe any of the above noted changes affect the health and safety of the public. Likewise, the above noted changes do not change the overall surveillance and control of radioactive discharges from the Kewaunee Plant.

Very truly yours,



E. W. James
Senior Vice President
Power Supply & Engineering

EWJ:sna

Enc.

Subscribed and Sworn to
Before Me This 9TH Day
of February 1976

Jerome O. Lewis
Notary Public, State of Wisconsin

My Commission Expires
February 11, 1979

3.9 RADIOACTIVE MATERIALS

Applicability

Applies to the controlled release of radioactive liquids and gases from the facility.

Objective

To define the values and conditions for the controlled release of radioactive effluents to the environs to ensure that these releases are as low as practicable. These releases should not result in radiation exposure in unrestricted areas greater than a few percent of natural background exposures.

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To assure that the releases of radioactive material to unrestricted areas meet the low as practicable concept, the following objectives apply:

For liquid wastes:

- a. The annual total quantity of radioactive materials released as liquid waste excluding tritium and dissolved gases, should not exceed 5 curies. 16
- b. The annual average concentration of radioactive materials released as liquid waste, prior to dilution in Lake Michigan, excluding tritium and dissolved gases, should not exceed 2×10^{-8} uCi/ml; 16
- c. The annual average concentration of tritium released as liquid waste, prior to dilution in Lake Michigan should not exceed 5×10^{-6} uCi/ml. 16

For gaseous wastes:

The release rate of radioactive isotopes, averaged over a yearly interval, except halogens and particulate radioisotopes with half lives greater than 8 days, discharged from the plant should not exceed 1.7×10^3 μ Ci/sec.

The release rate of halogens and other particulate radioisotopes with half lives longer than 8 days, averaged over a yearly interval, discharged from the plant should not exceed 9.2×10^{-4} $\mu\text{Ci/sec}$.

Specification

a. Liquid Effluents

1. The instantaneous gross radioactivity release concentration in liquid effluents from the plant shall not exceed the values specified in 10 CFR Part 20, Appendix B, for unrestricted areas.
2. The release rate of radioactive liquid effluents, excluding tritium and dissolved gases, shall not exceed 10 curies during any calendar quarter.
3. The annual average concentration of tritium prior to dilution in a natural body of water shall not exceed 3×10^{-3} $\mu\text{Ci/cc}$.
4. Steam generator activity shall be continuously recorded and monitored when in the "operating" mode. | 16
5. During release of liquid radioactive wastes, the following conditions shall be met.
 - a. The minimum dilution water required to satisfy 3.9.a.1 shall be met. | 16

- b. The gross activity monitor and recorder on the radwaste liquid effluent line shall be operable.
 - c. The effluent control monitor shall be set to alarm and automatically close the waste discharge valve prior to exceeding the limits specified in 3.9.a.1 above.
 - d. Liquid waste activity shall be continuously monitored and recorded during release and the flow rate shall be logged during release.
6. The equipment installed in the liquid radioactive waste treatment system shall be maintained and shall be operated to process all liquids prior to their discharge when the activity release rate would otherwise exceed 1.25 curies (excluding tritium and dissolved gases) during any calendar quarter.
7. The maximum activity to be contained in one liquid radwaste tank that can be discharged directly to the environs, shall not exceed 10 curies.
8. When the release rate of radioactive liquid effluents, excluding tritium and dissolved gases, exceeds 2.5 curies during any calendar quarter, the licensee shall notify the Director, Directorate of Licensing within 30 days, identifying the causes and describing the proposed program of action to reduce such release rates.

Basis

Liquid radioactive waste release levels to unrestricted areas should be kept "as low as practicable" and are not to exceed the concentration values specified in 10 CFR Part 20. These levels provide reasonable assurance that the resulting annual exposure to the whole body or any organ of an individual will not exceed 5 millirems per year. At the same time, these specifications permit the flexibility of operation, compatible with considerations of health and safety, to assure that the public is provided a dependable source of power under unusual

operating conditions which may temporarily result in releases higher than the design objective levels but still within the concentration values specified in 10 CFR Part 20. It is expected that by using this operational flexibility under unusual operating conditions, and exerting every effort to keep levels of radioactive material in liquid wastes as low as practicable, the annual releases will not exceed a small fraction of the annual average concentration values specified in 10 CFR Part 20. The "as low as practicable" liquid release objectives are based on guidelines that have not been adopted as yet. The release objectives of these specifications will be reviewed at the time Appendix I becomes a regulation to assure that these specifications are based upon the guidelines contained therein.

The design objectives have been developed based on operating experience taking into account a combination of variables including fuel failures, primary system leakage, primary-to-secondary system leakage and the performance of the various waste treatment systems.

Specification 3.9.a.1 requires the licensee to limit the concentration of radioactive materials in liquid effluents from the plant to levels specified in 10 CFR Part 20, Appendix B, for unrestricted areas. This specification provides assurance that no member of the general public can be exposed to liquids containing radioactive materials in excess of values considered permissible under the Commission's Rules and Regulations.

Specification 3.9.a.2 establishes an upper limit for the release of radioactive liquid effluents, excluding tritium and dissolved gases, of 10 curies during any calendar quarter. The intent of this specification is to permit the licensee the flexibility of operation to assure that the public is provided a dependable source of power under unusual operating conditions which may temporarily result in releases higher than the levels normally achievable when the plant and the liquid radwaste equipment are functioning as designed. Releases of up to 10 curies during any calendar quarter will not result in concentrations of radioactive material in liquid effluents in excess of small percentages of the values specified in 10 CFR Part 20; i.e. approximately one percent of an identified isotope basis. It is also in compliance with NEPA requirements.

In addition to the limiting conditions for operation listed under Specification 3.9.a.2, the reporting requirements of Specification 3.9.a.8 in addition to the requirements of Section 6.9, delineate that the licensee shall identify the cause whenever the release rate of radioactive liquid effluents, excluding tritium and dissolved gases, exceeds 2.5 curies during any calendar quarter and describe the proposed program of action to reduce such release rate. This report must be filed within 30 days following the calendar quarter in which such release occurred.

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Specification 3.9.a.3 restricts the release of tritium in radioactive liquids to the concentration values specified by 10 CFR Part 20. This concentration is considered as low as practicable on the basis of operating experience at other similar nuclear power plants.

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Specification 3.9.a.4 requires the monitoring of the steam generator activity, which may be a major source of activity released to the environment, to assure operational attention to excessive releases from this source.

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Specification 3.9.a.5 requires that suitable equipment to dilute and monitor the releases of radioactive materials in liquid effluents is operating during any period these releases are taking place.

Specification 3.9.a.6 requires that the licensee shall maintain and operate the equipment installed in the radwaste system to reduce the release of radioactive materials in liquid effluents to as low as practicable consistent with the requirements of 10 CFR Part 50.36a. Normal use and maintenance of installed equipment in the liquid radioactive waste treatment system is expected to result in releases of not more than about 5 curies per year, excluding tritium and dissolved gases, during normal operations. In order to keep releases of radioactive materials as low as practicable, the specification requires, as a minimum, operation of equipment whenever the rate of release exceeds 1.25 curies per quarter, excluding tritium and dissolved gases.

Specification 3.9.a.7 limits the amount of radioactivity that may be inadvertently released to the environment.

b. Airborne Effluents

1. The release rate of gross gaseous activity, except for halogens and particulates with half-lives longer than eight days, shall be limited to $3.6 \times 10^{-6} \frac{\text{sec}}{\text{m}^3} \left\{ \sum \frac{Q_i}{\text{MPC}_i} \right\} \leq 1$ where Q_i is the release rate in uCi/sec for isotope i , and MPC_i is the maximum permissible concentration of isotope i as defined in Appendix B, table II, Column 1, 10 CFR 20. 16
2. The release rate of halogens and particulates with half-lives greater than eight days released to the environs as part of airborne effluents, shall be controlled such that the release rate over any one hour period does not exceed 5.1×10^{-1} uCi/sec.
3.
 - a. The release rates of gross gaseous activity shall not exceed 16 percent of the value specified in 3.9.b.1 above, when averaged over any calendar quarter.
 - b. The release rates of halogens and particulates with half-lives greater than eight days shall not exceed 12 percent of the value specified in 3.9.b.2 above, when averaged over any calendar quarter.
4. During release of gaseous wastes, the following conditions shall be met:
 - a. The gross activity monitor, the iodine activity sampler and particulate activity sampler shall be operable.
 - b. Automatic isolation devices capable of terminating the gaseous release shall be operable. 16

c. The gross, halogen and particulate activity of all gaseous wastes released to the environment shall be monitored and recorded. For effluent streams having continuous monitoring capability, the activity and flow rate shall be monitored and recorded.

For effluent streams without continuous monitoring capability, the activity and release volume shall be monitored and recorded.

5. Radioactive gaseous wastes collected in the gas decay tanks shall be held up a minimum of 45 days, except for those gaseous wastes resulting from purge and fill operations associated with refueling and reactor startup. Releases of radioactive gaseous wastes at rates of 1/100 the limit specified by 3.9.b.1 are permitted at any time as required for operational flexibility.
6. Reactor containment building purge shall be filtered through the purge filter (HEPA - charcoal) whenever the concentration of iodine and particulate isotopes exceeds the occupational MPC inside the reactor building.
7. The maximum activity to be contained in one gas decay tank shall not exceed 43,500 curies. (Equivalent to Xe-133).
8. Gaseous waste from the condenser air ejector shall be filtered through HEPA filters provided in the Auxiliary Building Vent System.
9. When the annual projected release rate of radioactive materials in gaseous wastes, averaged over a calendar quarter exceeds twice the annual objectives, the licensee shall notify the Director, Directorate

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of Licensing within 30 days, identifying the cause and describing the proposed program of action to reduce such release rates.

Basis

The specified levels provide reasonable assurance that the resulting annual exposure rate from noble gases at any location on the site boundary will not exceed 10 millirems per year. At the same time these specifications permit the flexibility of operation, compatible with considerations of health and safety, to assure that the public is provided a dependable source of power under unusual operating conditions which may temporarily result in releases higher than the design objective levels but still within the concentration values specified in 10 CFR Part 20. It is expected that using this operational flexibility under unusual operating conditions, and by exerting every effort to keep levels of radioactive material in gaseous wastes as low as practicable, the annual releases will not exceed a small fraction of the annual average concentration values specified in 10 CFR Part 20. These efforts should include consideration of meteorological conditions during releases.

The design objectives have been developed taking into account a combination of system variables including fuel failures, primary system leakage, primary to secondary system leakage, steam generator blowdown and the performance of radioisotope removal mechanisms.

The noble gas release rate stated in the objectives is based on a X/Q value derived from the annual average meteorological data. The dispersion factor used, 3.6×10^{-6} sec/m³, is conservative and would control the release rate of noble gases such that the concentrations will be less than 2 percent of 10 CFR Part 20 levels at the site restricted area boundary (10 mrem per year).

The I-131 and particulate release rate stated in the objectives is based on an X/Q value derived from annual average meteorological data. The dispersion factor used ($3.6 \times 10^{-6} \text{ sec/m}^3$) would limit the concentration in air at nearby dairy farms to less than 1/70,000 of the 10 CFR 20 levels, with credit given for cows being on pasture only six months of the year. The factor of 1/70,000 is based on the fact that 1/700 of 10 CFR 20 levels (Appendix B, Table II, Column 1) in air will yield 500 mrem per year via the air-grass-milk pathway. The additional factor of 1/100 reduces the expected dose to 5 mrem per year.

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The "as low as practicable" gaseous release objectives are based on guidelines that have not been adopted as yet. The release objectives of these specifications will be reviewed at the time Appendix I becomes a regulation to assure that these specifications are based upon the guidelines contained therein.

Specification 3.9.b.1 requires the licensee to limit the concentration of radioactive materials in gaseous effluents, except for halogens and particulates with half-lives greater than eight days, from the plant to levels specified in 10 CFR Part 20, Appendix B, for unrestricted areas. The release rate will be determined by $1 \geq X/Q (\sum Q_i/MPC_i)$, where MPC_i is the MPC for isotope i as listed in Table II of 10 CFR Part 20, Appendix B, and X/Q is the annual average dispersion factor at the site boundary.

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Specification 3.9.b.2 requires the licensee to limit the concentration of halogens and particulates with half-lives greater than eight days released from the plant to 2/700 of the levels specified in 10 CFR Part 20, Appendix B, for unrestricted areas. The release rate will be determined by $Q \leq \frac{2}{700} \frac{MPC_I}{X/Q}$ where MPC_I is the MPC for isotope I-131 as listed in Table II of 10 CFR Part 20, Appendix B, X/Q is the annual average dispersion factor at the nearest cow, and 2/700 is the air-grass-milk re-concentration factor for six months grazing.

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Specification 3.9.b.3 establishes an upper limit for the release of noble gas activity at 16 percent and an upper limit for the release of halogen and particulate activity, with half-lives greater than eight days, at 12 percent of the instantaneous release limit averaged over any calendar quarter. The intent

of this specification is to permit the licensee the flexibility of operation to assure that the public is provided a dependable source of power under unusual operating conditions which may temporarily result in higher releases than the objectives. Gaseous releases will not result in exposures in excess of a small fraction of those specified in 10 CFR Part 20.

Specification 3.9.b.4 requires that suitable equipment to monitor the radioactive gaseous releases is operating during any period these releases are taking place.

Specification 3.9.b.5 requires a 45-day holdup time or a low rate of activity release for radioactive gaseous waste collected in the gas decay tanks to assure decay of most isotopes before being released. The doses at the site boundary after 45 days of holdup are calculated to result in less than 1 mrem/yr.

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Specification 3.9.b.6 limits the radioactivity that may be released to the environment as a result of containment purge.

Specification 3.9.b.7 limits the maximum off-site dose to well below the guidelines of 10 CFR Part 100, postulating the rupture of a waste gas decay tank holding the maximum activity releases all of the contents to the atmosphere.

Specification 3.9.b.8 provides for proper routing of the off-gases from the condenser air ejector through a continuously monitored exhaust system.

In addition to the limiting conditions for operation listed under 3.9.b.1, 3.9.b.2 and 3.9.b.3, the reporting requirements of Specification 3.9.b.9, in addition to the requirements in Section 6.9, delineate that the licensee shall identify the cause whenever the radioactive gaseous release rate exceeds twice the annual design objective averaged over a calendar quarter, and describe the proposed program of action to reduce such release rate. The report must be filed within 30 days following the calendar quarter in which more than twice the design release rate occurred.

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4.11 RADIOACTIVE MATERIALS

Applicability

Applies to the periodic test and record requirements and sampling and monitoring methods used for facilities effluents.

Objective

To ensure that radioactive liquid and gaseous releases from the facility are maintained as low as practicable and within the limits specified by Specifications 3.9.a and 3.9.b.

Specification

a. Liquid Effluents

1. Facility records shall be maintained of the radioactive concentrations and volume before dilution of each batch of liquid effluent released, and of the average dilution flow and length of time over which each discharge occurred.
2. Prior to release of each batch of liquid effluent, a sample shall be taken from that batch and analyzed for gross radioactivity. The concentration of each significant gamma energy peak will be determined to demonstrate compliance with Specification 3.9.a using the dilution water flow rate at time of discharge.
3. Radioactive liquid waste sampling and activity analysis shall be performed in accordance with Table TS 4.11-1.
4. The liquid effluent radiation monitor shall be calibrated at least quarterly by means of a check source and annually with a known radioactive source. Each monitor, as described, shall also have an instrument channel test monthly and a sensor check daily.

TABLE TS 4.1-2

MINIMUM FREQUENCIES FOR SAMPLING TESTS

<u>Sampling Tests</u>	<u>Test</u>	<u>Frequency</u>	<u>Maximum Time Between Tests (Days)</u>	
1. Reactor Coolant Samples	Gross Beta-Gamma activity (excluding tritium)	5/week	3	
	Tritium activity	Monthly	37	
	*Chemistry (Cl, F, O ₂)	3/Week	4	16
2. Reactor Coolant Boron	*Boron concentration	2/week	5	
3. Refueling Water Storage Tank Water Sample	Boron concentration	Monthly *****	37	
4. Boric Acid Tanks	Boron concentration	Weekly	8	
5. Accumulator	Boron concentration	Monthly	37	
6. Spent Fuel Pool	Boron concentration	Monthly **	37	
7. Secondary Coolant	Gross Beta-Gamma activity	Weekly	8	
	Iodine concentration (I-131)	Weekly when gross Beta-Gamma activity $\geq 1.0 \mu\text{Ci/cc}$	8	
8. Waste Disposal System Liquid Effluent Monitor	Gross Beta-Gamma activity	During each batch release	N.A.	16
9. Circulating Water Monitor	Radioactivity	Continuous ***	N.A.	16
10. Auxiliary Building Vent Monitor	Gross Beta-Gamma activity	Continuous ****	N.A.	
11. Containment Vessel Air Particulate Monitor	Fission gas particulate activity	Continuous ***	N.A.	16
12. Containment Vessel Radiogas Monitor	Fission gas	Continuous ***	N.A.	16

Notes

- * See Spec. 4.1.D
 ** Sample will be taken monthly when fuel is in the pool.
 *** Continuous monitoring takes place when reactor is in operation.
 **** Operable during refueling also.
 ***** And after adjusting tank contents

Proposed Change No. 16
 Proposed Amendment 14
 2/9/76