

REVISED ATTACHMENT "B"
FOR PROPOSED CHANGE NPF-10/15-111

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TABLE 4.11-2

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

Gaseous Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) ($\mu\text{Ci/ml}$) ^d
Waste Gas Storage	P Each Tank Grab Sample	P Each Tank	Principle Gamma Emitters ^g	1×10^{-4}
Containment Purge 42 inch	P Each Purge ^{b,c}	P Each Purge ^b	Principle Gamma Emitters ^g	1×10^{-4}
			H-3	1×10^{-6}
8 inch	M ^d Grab Sample	M ^d	Principal Gamma Emitters ^g	1×10^{-4}
			H-3	1×10^{-6}
1. Condenser Evacuation System	M ^d Grab Sample	M ^d	Principal Gamma Emitters ^g	1×10^{-4}
2. Plant Vent Stack	W ^{b,e}	W ^b	H-3	1×10^{-6}
D. All Release Types as listed in B and C above.	Continuous ^f Sampler	W ^d Charcoal Sample	I-131	1×10^{-12}
	Continuous ^f Sampler	W ^d Particulate Sample	I-133	1×10^{-10}
	Continuous ^f Sampler	W ^d Particulate Sample	Principal Gamma Emitters ^g (I-131, Others)	1×10^{-11}
	Continuous ^f Sampler	M Composite Particulate Sample	Gross Alpha	1×10^{-11}
	Continuous ^f Sampler	Q Composite Particulate Sample	Sr-89, Sr-90	1×10^{-11}
	Continuous ^f Monitor	Noble Gas Monitor	Noble Gases Gross Beta or Gamma	1×10^{-6}
E. Incinerated Oil ^h	Each batch ⁱ Grab Sample	Each batch ⁱ	Principal Gamma Emitters ^g	5×10^{-7}

TABLE NOTATION

- b. Analyses shall also be performed following shutdown, startup, or a THERMAL POWER change exceeding 15 percent of the RATED THERMAL POWER within a one hour period.
- c. Tritium grab samples shall be taken at least once per 24 hours when the refueling canal is flooded.
- d. Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing (or after removal from sampler). Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or THERMAL POWER change exceeding 15 percent of RATED THERMAL POWER in one hour and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLD's may be increased by a factor of 10.
- e. Tritium grab samples shall be taken at least once per 7 days from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.
- f. The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Specifications 3.11.2.1, 3.11.2.2 and 3.11.2.3.
- g. The principle gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 for gaseous emissions and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141 and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be detected and reported. Other peaks which are measureable and identifiable, together with the above nuclides, shall also be identified and reported.
- h. Incinerated oil may be discharged at points other than the plant vent stack. Release shall be accounted for based on pre-release grab sample data.
- i. Samples for incinerated oil releases shall be collected from representative samples of filtered oil in liquid form.

RADIOACTIVE EFFLUENTS

DOSE - RADIOIODINES, RADIOACTIVE MATERIALS IN PARTICULATE FORM AND TRITIUM

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to an individual from tritium, radioiodines and radioactive materials in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, from the site (see Figure 5.1-3) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 7.5 mrem to any organ and,
- b. During any calendar year: Less than or equal to 15 mrem to any organ.
- c. Less than 0.1% of the limits of 3.11.2.3(a) and (b) as a result of burning contaminated oil.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of tritium, radioiodines, and radioactive materials in particulate form, with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits, in lieu of any other report required by Specification 6.9.1, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause(s) for exceeding the limit and defines the corrective actions taken to reduce releases and the proposed actions to be taken to assure that subsequent releases will be in compliance with Specification 3.11.2.3.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.3 Dose Calculations Cumulative dose contributions for the current calendar quarter and current calendar year shall be determined in accordance with the ODCM at least once per 31 days.

REVISED BASIS FOR "NO SIGNIFICANT
HAZARDS CONSIDERATION"

Date of Amendment Request: April 17, 1984 (Reference PCN-111)

Description of Amendment Request:

PCN-111 would revise Technical Specification 3/4.11.2, "Radioactive Gaseous Waste Sampling and Analysis Program" of Technical Specification 3/4.11.2, "Gaseous Effluents," and Technical Specification 3.11.2.3, "Dose-Radioiodines, Radioactive Materials in Particulate Form and Tritium," in order to facilitate an exemption of 10 CFR 20.305 via technical specification changes to allow disposal of radioactively contaminated reactor coolant pump (RCP) motor oil, turbine building sump and other waste oil by incineration.

T.S. 3/4.11.2 provides the maximum dose rates at which radioactive gaseous effluents may be released into the environment. Table 4.11-2 lists the different types of radioactive gaseous releases and specifies sampling and analysis requirements to verify that dose rates are within the limit.

Currently, Table 4.11-2 does not recognize incineration of waste oil as a release type. The proposed change would revise Table 4.11-2 to reflect incineration of oil as a release type and specify sampling and analysis requirements which must be met prior to incineration in order to verify that the dose limit will not be exceeded.

T.S. 3.11.2.3 specifies limits on dose which an individual may receive due to radioiodines, radioactive materials in particulate form and tritium released from the plant in any calendar quarter and calendar year. The proposed change would revise T.S. 3.11.2.3 to limit the dose contribution resulting from the incineration of oil to less than 0.1% of the specified dose limits for radioiodines, particulates, and tritium.

Basis for proposed no significant hazards consideration determination:

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (vi) relates to a change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptance criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method. The proposed change is similar to example (vi) of 48 FR 14870 in that while the proposed change may result in some increase in the probability or consequences of a previously-analyzed accident or may reduce in some way a safety

margin, the results of the change are clearly within all acceptance criteria specified in the Standard Review Plan.

IE Information Notice No. 83-05, "Obtaining approval for disposing of very-low-level radioactive waste - 10 CFR 20.302," states that in accordance with 10 CFR 20.302(a), which concerns methods for obtaining approval of proposed disposal procedures, the Nuclear Regulatory Commission will give consideration to previously unauthorized disposal methods. As an example, IE Information Notice No. 83-05 relates that a proposal was approved in which the licensee requested that very low-level contaminated oil be allowed to burn in the plant's oil fired burners. The above described proposed change provides T.S. requirements which will allow slightly radioactive waste oil to be incinerated. Because IE Information Notice No. 83-05 states that the disposal of very-low-level contaminated oil by incineration has previously been approved, the proposed change is consistent with this notice. In addition, the proposed change will maintain the concentration and the dose rate of radioactivity within the limits specified by 10 CFR 20, Appendix B, Table II, Column 1 and 10 CFR 50, Appendix 1, respectively. Because the proposed change meets the above criteria, it is similar to example (vi) of 48 FR 14870.

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