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SUBJECT: Application for amend to license DPR-23, adopting provisions of 10CFR50, App J, Option B which will be implemented per RG 1.163, "Performance-Based Containment Leak-Test Program," dtd Sept 1995.

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CP&L**Carolina Power & Light Company**

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

RNP File No: 13510HA
Serial: RNP-RA/96-0016

JAN 31 1996

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE
PERFORMANCE-BASED CONTAINMENT INTEGRATED LEAK RATE TESTING

Gentlemen:

In accordance with 10 CFR 50.90, we are submitting a request for a change to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

The purpose of the proposed change to the HBRSEP, Unit No. 2 TS is to adopt the provisions of 10 CFR 50, Appendix J, Option B which will be implemented in accordance with Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995. Option B provides a performance-based test frequency as an alternative to the prescriptive requirements of Option A in Appendix J. In addition, the proposed TS change reflects the format of NUREG - 1431, Revision 1, the improved "Standard Technical Specifications - Westinghouse Plants." As proposed, the existing TS will be modified and a new requirement will be added to conduct containment leak rate testing in accordance with a program which specifically commits to 10 CFR 50, Appendix J, Option B, as implemented by RG 1.163, for Type A tests; and commits to 10 CFR 50, Appendix J, Option A for Type B and C tests. We have reviewed the proposed change against the criteria in 10 CFR 50.59, "Changes, tests, and experiments," and concluded that the proposed change constitutes an unreviewed safety question in that operation of the facility in accordance with the proposed change may result in an increase in the consequences of a previously evaluated accident, due to a decrease in the interval of conducting containment leakage Type A tests. However, information supporting a finding of no significant hazards consideration is provided in Enclosure 3.

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Enclosure 1 provides an affidavit as required by 10 CFR 50.30(b).

Enclosure 2 provides a detailed description of the proposed change and the basis for the change.

Enclosure 3 details, in accordance with 10 CFR 50.91(a), the basis for our conclusion that the proposed change does not involve a significant hazards consideration.

Enclosure 4 provides an environmental evaluation which demonstrates that the requested change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the proposed change to the TS.

Enclosure 5 provides page change instructions for incorporating the proposed change.

Enclosure 6 provides the proposed TS pages.

In accordance with 10 CFR 50.91(b), we are providing the State of South Carolina with a copy of the proposed change to the TS.

We have determined that implementation of the proposed change will result in a savings of approximately \$5,769,000 over the remaining term of the operating license. Accordingly, this request is being submitted as a cost-beneficial licensing action.

Approval of this request is needed to support Refueling Outage 17, currently scheduled to begin in September 1996. Accordingly, we request that the NRC approve this request by July 1996. In order to allow time for procedure revision and orderly incorporation into copies of the TS, we request that the proposed change, once approved by the NRC, be issued such that implementation will occur within 60 days of issuance of the amendment.

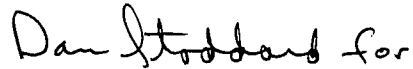
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Please refer any questions regarding this submittal to me at (803) 857-1802.

Very truly yours,



R. M. Krich
Manager - Regulatory Affairs

JSK/klb

Enclosures:

1. Affidavit
 2. Basis for Change Request
 3. 10 CFR 50.92 Evaluation
 4. Environmental Considerations
 5. Page Change Instructions
 6. Technical Specifications Pages
- c: Mr. Max K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP
Attorney General (SC)

Affidavit

State of South Carolina

County of Darlington

C. S. Hinnant, having been first duly sworn, did depose and say that the information contained in letter 96-0016 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

C S Hinnant

Sworn to and subscribed before me

this 31st day of JANUARY 1996

(Seal)

David Clark
Notary Public for South Carolina

My commission expires: MARCH 21, 2005

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE
PERFORMANCE-BASED CONTAINMENT INTEGRATED LEAK RATE TESTING

BASIS FOR CHANGE REQUEST

Proposed Change

The purpose of the proposed change to the H.B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS) is to adopt the provisions of 10 CFR 50, Appendix J, Option B to be implemented in accordance with Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995. Option B provides a performance-based test frequency as an alternative to the prescriptive requirements of Option A in 10 CFR 50, Appendix J. In addition, the proposed TS change reflects the format of NUREG - 1431, Revision 1, the improved "Standard Technical Specifications - Westinghouse Plants." As proposed, the existing TS will be modified and a new requirement will be added to conduct containment leak rate testing in accordance with a program which specifically commits to 10 CFR 50, Appendix J, Option B, as implemented by RG 1.163, for Type A tests; and commits to 10 CFR 50, Appendix J, Option A for Type B and C tests.

The HBRSEP TS were issued in 1970 using a custom format. TS Section 4.4, "Containment Tests," addresses all containment testing. TS Section 4.4.1, "Operational Leakage Rate Tests," includes 10 CFR 50, Appendix J, Type A tests in TS Section 4.4.1.1, "Integrated Leak Rate Tests (ILRT)," and Type B and Type C tests in TS Section 4.4.1.2, "Sensitive or Local Leak Rate Test (SLRT)."

ILRT (i.e., Type A tests) required by TS Section 4.4.1.1a., prior to initial plant operation, have been completed. This paragraph is therefore no longer required and is being deleted.

TS Section 4.4.1.1b. requires testing at intervals specified in TS Section 4.4.1.1g. and specifies the test pressures. 10 CFR 50, Appendix J also specifies the same requirement to test at accident pressure. This TS requirement is redundant to 10 CFR 50, Appendix J and is not necessary since the proposed Containment Leakage Rate Testing Program commits to meet the requirements of 10 CFR 50, Appendix J, as appropriate. TS Section 4.4.1.1b. will therefore be deleted.

TS 4.4.1.1c. requires that the ILRT test duration meet the requirements of 10 CFR 50, Appendix J and the recommendations of American National Standards Institute (ANSI) Standard N45.4 (1972), "Leakage Rate Testing of Containment Structures for Nuclear Power Plants." This TS requirement is redundant to 10 CFR 50, Appendix J and is not necessary since the proposed Containment Leakage Rate Testing Program commits to meet the requirements of 10 CFR 50, Appendix J, as appropriate. TS Section 4.4.1.1c. will therefore be deleted.

TS 4.4.1.1d., e., and f., reiterate requirements contained in 10 CFR 50, Appendix J. These sections are redundant to 10 CFR 50, Appendix J and are not required since the proposed Containment Leakage Rate Testing Program, discussed below, commits to meet the requirements of 10 CFR 50, Appendix J, as appropriate. TS Sections 4.4.1.1d., e., and f. will therefore be deleted.

TS Section 4.4.1.1g. provided the test frequency requirements for Type A testing by reiterating the periodic retesting schedule in 10 CFR 50, Appendix J, Paragraph III.D. The NRC has approved 10 CFR 50, Appendix J, Option B for the express purpose of allowing performance based testing frequencies. Option B requires ILRT testing at P_a , the peak calculated containment internal pressure for the design basis loss of coolant accident, every 10 years based on acceptable test performance data from previous testing. We have conducted seven Type A tests, including three Structural Integrity Tests (SITs) since 1970. All the tests have indicated that leakage was less than the $0.75 L_a$ TS leakage limit for ILRTs. This TS requirement is redundant to 10 CFR 50, Appendix J and is not necessary since the proposed Containment Leakage Rate Testing Program commits to meet the requirements of 10 CFR 50, Appendix J, as appropriate. TS Section 4.4.1.1g. will therefore be deleted.

TS 4.4.1.2 discusses the requirements for Sensitive or Local Leak Rate Tests (LLRTs). This section reiterates the requirements of 10 CFR 50, Appendix J for Type B and C tests (i.e., LLRTs).

TS Section 4.4.1.2a. requires that testing be performed each refueling outage except for the personnel air lock. The air lock shall be tested at six month intervals. The above requirements were derived directly from 10 CFR 50, Appendix J. The requirements for testing the containment personnel airlock will be relocated to the revised TS Section 4.4.1. The remainder of these TS requirements are redundant to 10 CFR 50, Appendix J and are not necessary since the proposed Containment Leakage Rate Testing Program commits to meet the requirements of 10 CFR 50, Appendix J, as appropriate. TS Section 4.4.1.2a. will therefore be deleted.

TS Section 4.4.1.2b. describes the action level at which repairs and retests shall be performed based on results from LLRTs. 10 CFR 50, Appendix J also addresses the allowable leakage rates from Type B and C tests and when repairs and retesting is required. These TS requirements are redundant to 10 CFR 50, Appendix J and are not necessary since the proposed Containment Leakage Rate Testing Program commits to meet the requirements of 10 CFR 50, Appendix J, as appropriate. TS Section 4.4.1.2b. will therefore be deleted.

TS Section 4.4.1.2.b splits the allowable leakage rate between Type B and Type C tests. The adoption of 10 CFR 50, Appendix J, directly by reference clarifies that the sum of Type B and Type C leakage must be less than or equal to $0.6 L_a$. The split of the allowable leakage rate from $0.6 L_a$ for the total of both Type B and C leakages into $0.3 L_a$ for Type B leakage and $0.3 L_a$ for Type C leakage is no longer necessary.

TS Section 4.4.2, "Isolation Valve Tests," states that "Isolation valves shall be tested for operability at each refueling." TS Section 4.4.2b. states that "Isolation valves which are pressurized by the PPS will be leak tested as part of the sensitive leak rate test." The intent of these requirements will not be changed. TS Section 4.4.2b. will be changed to require that testing shall be accomplished in accordance with the Containment Leakage Rate Testing Program, thereby meeting the requirements of 10 CFR 50, Appendix J.

TS Section 4.4.2c. will not be altered. Testing using the Isolation Valve Seal Water (IVSW) system will be required at each refueling outage. IVSW is a qualified seal water system in that it has a 30 day supply available at a pressure of 1.1 P_a, as specified in 10 CFR 50, Appendix J. This testing is required each refueling outage, but the leakage is not considered against the Type B and Type C tests limits in accordance with 10 CFR 50, Appendix J, Section III.C.3.(a) and (b). These test results are compared to the acceptance criteria as described in the system design basis.

A revised TS Section 4.4.1, "Operational Leakage Rate Testing," is proposed that states that required visual examinations and leakage rate testing shall be performed in accordance with the Containment Leakage Rate Testing Program, except for testing of the containment personnel airlock. The containment personnel airlock shall be tested at six month intervals. This requirement for testing of the containment personnel airlock is a relocation of the existing requirement for testing of the containment personnel airlock currently contained in TS Section 4.4.1.2a.

A new TS Section 6.12 is proposed that describes the Containment Leakage Rate Testing Program, that specifically commits to meeting the requirements of 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as implemented by RG 1.163, for Type A tests; and, commits to meeting the requirements of 10 CFR 50, Appendix J, Option A, for Type B and C tests. Changes to the TS Bases are proposed to better reflect the basis for the proposed changes.

Basis

I. HBRSEP, Unit No. 2 Type A Testing History

We have performed several Type A tests of the containment from the pre-operational period up to and including the twenty year SIT required by TS Section 4.4.4.2, "Containment Structural Test." Three individual SITs were performed in 1970, 1974, and 1992 and seven periodic ILRTs (i.e., Type A tests) have been performed over a 23 year period. Test results and conclusions substantiate that the reliability and performance of the containment's design has not been challenged. The additional margin of safety from supporting containment isolation systems testing (i.e., Type B and Type C tests) provides additional justification for the proposed change.

II. Structural Performance of Containment

Our testing history indicates that during all Type A testing, the 10 CFR 50, Appendix J and TS leak rate acceptance criteria have not been exceeded (i.e., see the enclosed Figure 1, "Historical ILRT Results"). There are no existing anomalies specific to the functional requirements of the containment structure itself which would adversely impact extending the Type A test frequency schedule in accordance with 10 CFR 50, Appendix J, Option B. The 1992 SIT results indicated good agreement with the 1970 and 1974 SIT results and all acceptance criteria were satisfied, ensuring the continued integrity of the structure.

III. Containment Support Systems/Testing

Type B and C testing is also performed in accordance with 10 CFR 50, Appendix J, and the IVSW system and piping Penetration Pressurization System (PPS) functions to provide further assurance of containment functionality.

NUREG-1493, "Performance-Based Containment Leak-Test Program," provides the technical basis for the NRC's rulemaking to revise containment leakage testing requirements for nuclear power reactors in 10 CR 50, Appendix J. The Nuclear Energy Institute (NEI) published NEI 94-01, Revision 0, "Industry Guideline For Implementing Performance-Based Option of 10 CFR 50, Appendix J," to provide consistent guidance for implementing a performance-based containment leakage testing program. RG 1.163 endorses NEI 94-01, Revision 0 stating, in part, that it "... provides methods acceptable to the NRC for complying with the provisions of Option B in Appendix J to 10 CFR Part 50"

RG 1.163 provides four exceptions to the guidance in NEI 94-01, Revision 0. Exception 1 discusses the test interval for Type A tests. The RG states that ANSI/ANS 56.8-1994, "Containment System Leakage Testing Requirements," test intervals are not performance based. Therefore, licensees intending to comply with 10 CFR 50, Appendix J, Option B for Type A test intervals must comply with Section 11.0 of NEI 94-01. The other 3 exceptions are not pertinent to the discussion of Type A test frequencies. Section 11.0 of NEI 94-01 refers the licensee to Sections 9 and 10 of that document. Section 9.2.3 "Extended Test Intervals," discusses Type A tests. This section states the following.

"Type A testing shall be performed during a period of reactor shutdown at a frequency of at least once per 10 years based on acceptable performance history. Acceptable performance history is defined as completion of two consecutive period Type A tests where the calculated performance leakage rate was less than $1.0 L_a$ Elapsed time between the first and last tests in a series must be at least 24 months."

NUREG-1493, Section 10.1.2, "Leakage-Testing Intervals," states the following for Type A testing.

- "1. Reducing the frequency of Type A tests (ILRTs) from the current three per 10 years to one per 20 years was found to lead to an imperceptible increase in risk. The estimated increase in risk is very small because ILRTs identify only a few potential containment leakage paths that cannot be identified by Type B and C testing, and the leaks found by Type A tests have been only marginally above existing requirements.
2. Given the insensitivity of risk to containment leakage rate and the small fraction of leakage paths detected solely by Type A testing, increasing the interval between ILRTs is possible with minimal impact on public risk."

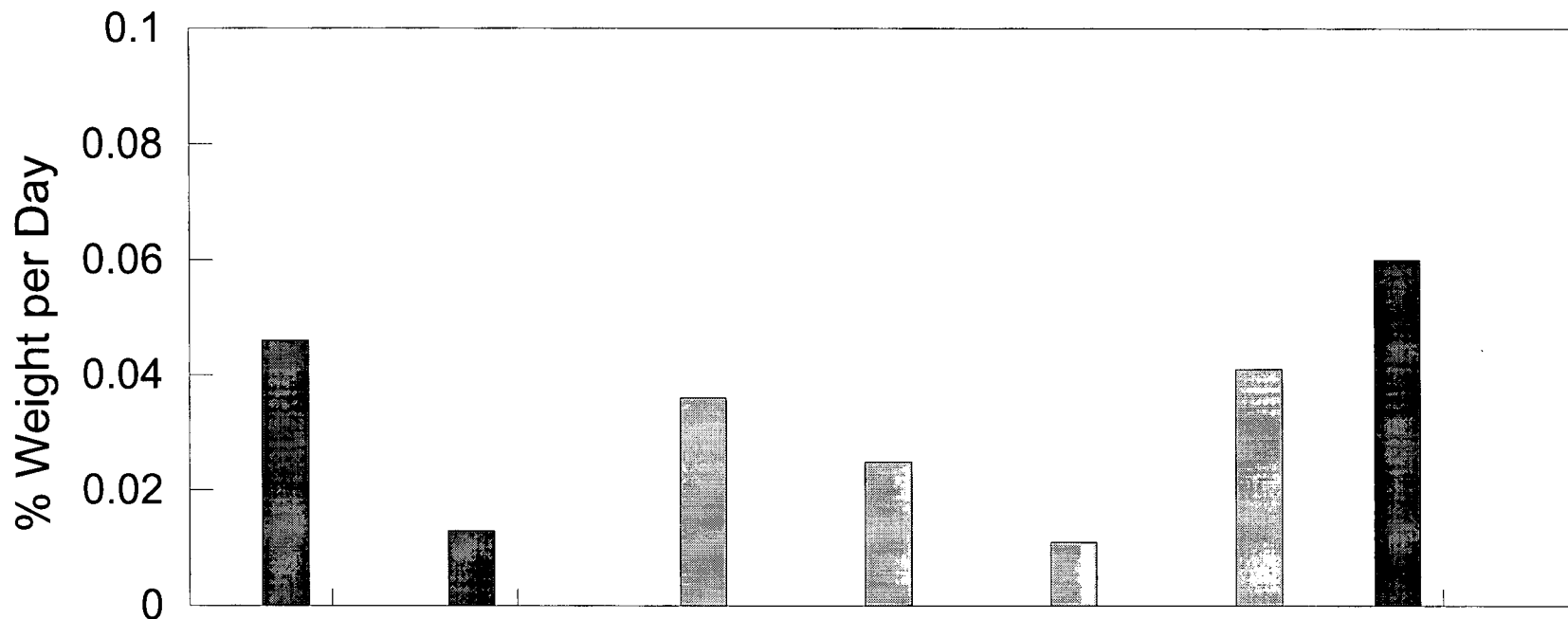
In our letter to the NRC, dated June 30, 1983, we stated that the $0.6 L_a$ acceptance criterion has been divided in half. One half (i.e., 30% of L_p) is allocated to penetrations and valves served by PPS, and one half has been allocated to containment isolation valves subject to Type C and Type B testing, but not served by the PPS. This allocation is overly restrictive with respect to meeting the 10 CFR 50, Appendix J, acceptance criteria, which states in Sections III.B.3 and III.C.3, ". . .the combined leakage rate for all penetrations and valves subject to Type B and C tests shall be less than $0.6 L_a$." This change will allow us to eliminate the unnecessary requirement of halving the $0.6 L_a$ limit between Type B and C tests and change the limit to that specified in 10 CFR 50, Appendix J (i.e., $0.6 L_a$ total of Type B and Type C tests).

Conclusion

The proposed change is justified by the testing history at HBRSEP, Unit No. 2 and will continue to provide an acceptable level of safety.

Historical ILRT Results

H. B. Robinson Steam Electric Plant, Unit No. 2



Test Year	1970	1974	1978	1982	1984	1987	1992
■ Pa Tests	0.046	0.013					0.060
▨ 1/2 Pa Tests			0.036	0.025	0.011	0.041	
▩ SIT Run?	YES	YES					Yes

Figure 1

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
NRC DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR TECHNICAL SPECIFICATIONS CHANGE
PERFORMANCE-BASED CONTAINMENT INTEGRATED LEAK RATE TESTING

10 CFR 50.92 EVALUATION

We have concluded that the proposed change to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS) for the adoption of 10 CFR 50, Appendix J, Option B for Type A containment leakage rate tests does not involve a significant hazards consideration. In support of this determination, an evaluation of each of the three standards set forth in 10 CFR 50.92 is provided below.

Proposed Change

The purpose of the proposed change to the H.B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS) is to adopt the provisions of 10 CFR 50, Appendix J, Option B to be implemented in accordance with the Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995. Option B provides a performance-based test frequency as an alternative to the prescriptive requirements of Option A in 10 CFR 50, Appendix J. In addition, the proposed TS change reflects the format of NUREG - 1431, Revision 1, the improved "Standard Technical Specifications - Westinghouse Plants." As proposed, the existing TS will be modified and a new requirement will be added to conduct containment leak rate testing in accordance with a program which specifically commits to 10 CFR 50, Appendix J, Option B, as implemented by RG 1.163, for Type A tests; and commits to 10 CFR 50, Appendix J, Option A for Type B and Type C tests.

Basis

The proposed change does not involve a significant hazards consideration for the following reasons.

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The HBRSEP, Unit No. 2 Type A testing history provides substantial justification for the proposed test schedule change to one test in a 10 year period. Three Structural Integrity Tests (SITs) and seven Integrated Leak Rate Tests (ILRTs) have been performed with acceptable results. Previous testing has affirmed the acceptable reliability of the containment structure to minimize leakage as designed, and provides assurance that its performance to continuously function as designed is not challenged due to this test schedule extension to once in 10 years.

Therefore, this proposed change to the TS that revises the Type A testing frequency does not involve an increase in the probability of an accident previously evaluated.

This proposed change to revise the test schedule frequency does not impact nor alter the design of any system, structure or component. The limit on allowable leakage is not increased. Type A testing provides periodic verification of the leak tight integrity of the containment and the systems and components that penetrate the containment structure.

NUREG-1493, "Performance-Based Containment Leak-Test Program," provides the technical basis for the NRC's rulemaking to revise containment leakage testing requirements for nuclear power reactors in 10 CR 50, Appendix J. Section 10.1.2 of NUREG - 1493, "Summary of Technical Findings, Leakage-Testing Intervals," states the following.

- "1. Reducing the frequency of Type A tests (ILRTs) from the current three per 10 years to one per 20 years was found to lead to an imperceptible increase in risk. The estimated increase in risk is very small because ILRTs identify only a few potential containment leakage paths that cannot be identified by Type B and C testing, and the leaks found by Type A tests have been only marginally above existing requirements.
2. Given the insensitivity of risk to containment leakage rate and the small fraction of leakage paths detected solely by Type A testing, increasing the interval between ILRTs is possible with minimal impact on public risk."

Therefore, based on the previous Type A test results, the proposed change does not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change only incorporates the performance based testing approach authorized in 10 CFR 50, Appendix J, Option B, and is justified based on previous plant-specific Type A test results. Plant structures, systems, and components will not be operated in a different manner as a result of this proposed change and no physical modifications to equipment are involved. The interval extensions allowed by Option B of 10 CFR 50, Appendix J, do not have the potential for creating the possibility of new or different type of accidents from those previously evaluated.

3. The proposed change does not involve a significant reduction in the margin of safety.

The proposed change does not change the allowable leak rate from the containment, it only allows an extension of the interval between the performance of Type A leak rate testing. NUREG-1493, which provides the technical basis for the NRC's rulemaking to revise containment leakage testing requirements for nuclear power reactors in 10 CR 50, Appendix J. Section 10.1.2 of NUREG - 1493, "Summary of Technical Findings, Leakage-Testing Intervals," states the following.

- “1. Reducing the frequency of Type A tests (ILRTs) from the current three per 10 years to one per 20 years was found to lead to an imperceptible increase in risk. The estimated increase in risk is very small because ILRTs identify only a few potential containment leakage paths that cannot be identified by Type B and C testing, and the leaks found by Type A tests have been only marginally above existing requirements.
2. Given the insensitivity of risk to containment leakage rate and the small fraction of leakage paths detected solely by Type A testing, increasing the interval between ILRTs is possible with minimal impact on public risk.”

Based on these considerations and the previous plant-specific Type A test results, the proposed change does not involve a reduction in the margin of safety.

Conclusion

Based on the above evaluation, we have concluded that the proposed change does not involve a significant hazards consideration.

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PERFORMANCE-BASED CONTAINMENT INTEGRATED LEAK RATE TESTING

ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed change to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed change would not (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site; (3) result in an increase in individual or cumulative occupational radiation exposure. We have reviewed this request and determined that the proposed change meets 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 needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows.

Proposed Change

The purpose of the proposed change to the H.B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS) is to adopt the provisions of 10 CFR 50, Appendix J, Option B to be implemented in accordance with the Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995. Option B provides a performance-based test frequency as an alternative to the prescriptive requirements of Option A in 10 CFR 50, Appendix J. In addition, the proposed TS change reflects the format of NUREG - 1431, Revision 1, the improved "Standard Technical Specifications - Westinghouse Plants." As proposed, the existing TS will be modified and a new requirement will be added to conduct containment leak rate testing in accordance with a program which specifically commits to 10 CFR 50, Appendix J, Option B, as implemented by RG 1.163, for Type A tests; and commits to 10 CFR 50, Appendix J, Option A for Type B and Type C tests.

Basis

The proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons.

1. As demonstrated in Enclosure 3, the proposed change does not involve a significant hazards consideration.
2. The proposed change does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site. The proposed change will tend to decrease any effluents that may be released off-site, and will not result

in a change in the types of effluents generated. The proposed change will extend the Integrated Leak Rate Test (ILRT) test frequency from three tests in 10 years to one test in 10 years, thus lowering the expected release of any effluents dose due to performance of ILRTs by two thirds over 10 years. The means of performing the tests will remain unchanged, hence no change in the types of effluents would be expected.

3. The proposed change do not result in an increase in individual or cumulative occupational radiation exposure. The proposed change will tend to lower the cumulative occupational exposure. The proposed change will extend the ILRT test frequency from three tests in 10 years to one test in 10 years, thus lowering the expected dose due to performance of ILRTs by two thirds over 10 years. Therefore, the proposed change does not result in an increase in individual or cumulative occupational radiation exposure.

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PAGE CHANGE INSTRUCTIONS

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TECHNICAL SPECIFICATIONS PAGES