

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION REVISION

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Table 3.5.5-2  
GASEOUS PROCESS AND EFFLUENT  
MONITORING INSTRUMENTATION  
OPERATING CONDITIONS

<u>INSTRUMENT</u>	A MINIMUM OPERABLE CHANNELS (PER RELEASE PATH)	<u>APPLICABILITY</u>	B OPERATOR ACTION IF MINIMUM NUMBER OF OPERABLE CHANNELS IS NOT MET
1. Waste Gas Holdup Tanks			
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination Of Release (RIA-37, - 38)	1	**	(a)
b. Effluent Flow Rate Monitor (Waste Gas Discharge Flow)	1	**	(b)
2. Unit Vent Monitoring System			
a. Noble Gas Activity Monitor Providing Alarm and Automatic Termination of Con- tainment Purge Re- lease (RIA - 45)	1	*	(a)
b. Iodine Sampler	1	*	(d)
c. Particulate Sampler	1	*	(d)
d. Effluent Flow Rate Monitor (Unit Vent Flow)	1	*	(b)
e. Sampler Flow Rate Monitor	1	*	(e)
f. Effluent Flow Rate Monitor (Containment Purge)	1	**	(b)
3. Interim Radwaste Building Ventilation Monitoring System			
a. Noble Gas Activity Monitor (RIA - 53)	1	*	(c)
b. Iodine Sampler	1	*	(d)
c. Particulate Sampler	1	*	(d)

Table 3.5.5-2 (Cont'd)  
GASEOUS PROCESS AND EFFLUENT  
MONITORING INSTRUMENTATION  
OPERATING CONDITIONS

<u>INSTRUMENT</u>	A MINIMUM OPERABLE CHANNELS (PER RELEASE PATH)	<u>APPLICABILITY</u>	B OPERATOR ACTION IF MINIMUM NUMBER OF OPERABLE CHANNELS IS NOT MET
d. Effluent Flow Rate Monitor (Interim Radwaste Exhaust)	1	*	(b)
e. Sampler Flow Rate Monitor	1	*	(e)
4. Hot Machine Shop Ventilation Monitoring System			
a. Iodine Sampler	1	*	(d)
b. Particulate Sampler	1	*	(d)
c. Effluent Flow Rate Monitor (Hot Machine Shop Exhaust)	1	*	(b)
d. Sampler Flow Rate Monitor	1	*	(e)
5. Radwaste Facility Ventilation Monitoring System			
a. Noble Gas Activity Monitor (4 RIA-45)#	1	*	(c)
b. Iodine Sampler#	1	*	(d)
c. Particulate Sampler#	1	*	(d)
d. Effluent Flow Rate Monitor (Radwaste Facility Exhaust)#	1	*	(b)
e. Sampler Flow Rate Monitor#	1	*	(e)

\* At all times.

\*\* During waste gas holdup tank releases and/or containment purge operation.

# Effective upon initial employment of Radwaste Facility for radwaste processing.

TABLE 4.1-3 Continued

Minimum Sampling Frequency And Analysis Program

<u>Item</u>	<u>Check</u>	<u>Frequency</u>	<u>Lower Limit of Detection<sup>(5)</sup> of Lab Analysis for Waste</u>
7. Condensate Test Tank, Condensate Monitoring Tank, Laundry-Hot Shower Tank, Waste and Recycle Monitor Tanks	a. Principal Gamma Emitters <sup>(6)</sup> including Dissolved Noble Gases	a. Composite Grab Sample prior to release of each batch <sup>(11)</sup>	a. Ce-144 and Mo-99 $<5 \times 10^{-6}$ $\mu\text{Ci/ml}$ Other Gamma Nuclides $<5 \times 10^{-7}$ $\mu\text{Ci/ml}$ Dissolved Gases $<10^{-5}$ $\mu\text{Ci/ml}$ I-131 $<10^{-6}$ $\mu\text{Ci/ml}$
	b. Radiochemical Analysis Sr 89, 90, Fe-55	b. Quarterly from all composited batches	b. $<5 \times 10^{-8}$ $\mu\text{Ci/ml}$ for Sr's $<10^{-6}$ $\mu\text{Ci/ml}$ for Fe-55
	c. Tritium	c. Monthly Composite	c. $<10^{-5}$ $\mu\text{Ci/ml}$
	d. Gross Alpha Activity	d. Monthly Composite	d. $<10^{-7}$ $\mu\text{Ci/ml}$
8. Unit Vent Sampling (Includes Waste Gas Decay Tanks, Reactor Building Purges, Auxiliary Building Ventilation, Spent Fuel Pool Ventilation, Air Ejectors)	a. Iodine Spectrum <sup>(4)</sup>	a. Continuous monitor, weekly sample <sup>(8)</sup>	a. $<10^{-10}$ $\mu\text{Ci/cc}$ (I-133) $<10^{-12}$ $\mu\text{Ci/cc}$ (I-131)
	b. Particulates <sup>(4)</sup>	b.	b.
	(1) Ce-144 and Mo-99	(1) Weekly Composite <sup>(8)</sup>	(1) $<5 \times 10^{-9}$ $\mu\text{Ci/cc}$
	(2) Other Principal Gamma Emitters <sup>(7)</sup>	(2) Weekly Composite <sup>(8)</sup>	(2) $<10^{-10}$ $\mu\text{Ci/cc}$
	(3) Gross Alpha Activity	(3) Monthly, using composite samples of one week	(3) $<10^{-11}$ $\mu\text{Ci/cc}$
	(4) Radiochemical Analysis Sr 89, 90	(4) Quarterly Composite	(4) $<10^{-11}$ $\mu\text{Ci/cc}$
	c. Cases by Principal Gamma <sup>(7)</sup> Emitters	c. Weekly Grab Sample	c. $<10^{-4}$ $\mu\text{Ci/cc}$
	d. Tritium	d. Weekly Grab Sample	d. $<10^{-6}$ $\mu\text{Ci/cc}$

TABLE 4.1-3 Continued

Minimum Sampling Frequency And Analysis Program

<u>Item</u>	<u>Check</u>	<u>Frequency</u>	<u>Lower Limit of Detection<sup>(5)</sup> of Lab Analysis for Waste</u>
14. Radwaste Facility Ventilation	a. Iodine Spectrum <sup>(4)</sup>	a. Continuous monitor, weekly sample <sup>(8)</sup>	a. $<10^{-9}$ $\mu\text{Ci/cc}$ (I-133) $<10^{-11}$ $\mu\text{Ci/cc}$ (I-131)
	b. Particulates <sup>(4)</sup>	b.	b.
	(1) Ce-144 and Mo-99	(1) Weekly Composite <sup>(8)</sup>	(1) $<5 \times 10^{-9}$ $\mu\text{Ci/cc}$
	(2) Other Principal Gamma Emitters <sup>(7)</sup>	(2) Weekly Composite <sup>(8)</sup>	(2) $<10^{-10}$ $\mu\text{Ci/cc}$
	(3) Gross Alpha Activity	(3) Monthly, using composite samples of one week	(3) $<10^{-11}$ $\mu\text{Ci/cc}$
	(4) Radiochemical Analysis Sr 89, 90	(4) Quarterly Composite	(4) $<10^{-11}$ $\mu\text{Ci/cc}$
	c. Cases by Principal Gamma <sup>(7)</sup> Emitters	c. Weekly Grab Sample	c. $<10^{-4}$ $\mu\text{Ci/cc}$
	d. Tritium	d. Weekly Grab Sample	d. $<10^{-6}$ $\mu\text{Ci/cc}$

TABLE 4.1-4 (Continued)

## RADIOACTIVE EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL RESPONSE CHECK (4)	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
7. Interim Radwaste Building Ventilation Monitoring				
a. Noble Gas Activity Monitor (RIA-53)	DA	MO	AN(3)	QU(2)
b. Iodine Sampler	DA	NA	NA	NA
c. Particulate Sampler	DA	NA	NA	NA
d. Effluent Flow Rate Monitor (Interim Radwaste Exhaust)	DA	NA	AN	NA
e. Minimum Flow Device	DA	NA	AN	NA
8. Hot Machine Shop				
a. Iodine Sampler	DA	NA	NA	NA
b. Particulate Sampler	DA	NA	NA	NA
c. Effluent Flow Rate Monitor (Hot Machine Shop Exhaust)	DA	NA	NA	NA
d. Minimum Flow Device	DA	NA	AN	NA
9. Radwaste Facility Ventilation Monitoring				
a. Noble Gas Activity Monitor (4RIA-45)#	DA	MO	AN(3)	QU(2)
b. Iodine Sampler#	DA	NA	NA	NA
c. Particulate Sampler#	DA	NA	NA	NA
d. Effluent Flow Rate Monitor (Radwaste Facility-Exhaust)#	DA	NA	AN	NA
e. Minimum Flow Device#	DA	NA	AN	NA

\*During each release via this pathway.

#Effective upon initial employment of Radwaste Facility for radwaste processing.

Frequency NotationDA - Daily  
QU - QuarterlyMO - Monthly  
AN - AnnuallyPR - Completed prior to each release  
NA - Not Applicable

ATTACHMENT II

JUSTIFICATION AND NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

## ATTACHMENT II

### JUSTIFICATION AND NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

Pursuant to the requirements of 10 CFR 50.91, this analysis provides a determination that the proposed amendment of the Technical Specification does not involve any significant hazards consideration, as defined by 10 CFR 50.92.

The proposed changes include additional operability requirements of monitors and surveillance items required by the addition of the Radwaste facility at Oconee Nuclear Station. Specific approval for operation of the incinerator, which is contained within the radwaste facility, was requested in a June 10, 1985 letter from Hal B. Tucker, Duke Power Company, to Harold R. Denton, NRC (Supplements dated 10/9/85, 10/25/85 and 11/25/85). The request for approval of the incinerator was made pursuant to 10 CFR 20.302.

10 CFR 50.92 states that a proposed amendment involves no significant hazards considerations if operation in accordance with the proposed amendment meets the three following criteria.

#### (A) Criterion 1

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

The proposed amendment does not involve any increase in the probability or consequences of a previously evaluated accident. The amendment constitutes additional operability requirements of monitors and surveillance requirements for the incinerator. Appropriate accident analyses for the incinerator were provided in the June 10, 1985 submittal. The activity release by nuclide and the dose estimated for each of the accident cases analyzed are provided in the June 10, 1985 submittal. The doses calculated were derived with conservative assumptions and were found to be below 10 CFR 20 annual dose limits. Therefore, the consequences of these accidents analyzed will not be significantly increased. The proposed changes include additional operability requirements of monitors and surveillance requirements associated with the incinerator. As such, this change is not considered to be an initiator of the accidents analyzed.

#### (B) Criterion 2

The proposed amendment does not create the possibility of a new or different kind of accident than any previously evaluated.

The proposed changes do not involve any physical changes to the plant. This amendment results from the addition of the radwaste facility at ONS. No new or different kind of accident can be created since this amendment only adds additional sampling points for surveillance and defines the operability requirements for the radwaste facility monitors.



(C) Criterion 3

The proposed amendment does not involve a significant reduction in a margin of safety.

The proposed changes result in more restrictive surveillance requirements and defines the operability requirements of the monitors within the radwaste facility. In addition, the doses calculated, as referenced in Duke's June 10, 1985 submittal, were found to be below 10 CFR 20 Annual Dose Limits. Therefore the health and safety of the general public will not be adversely affected. As such, the proposed amendment does not reduce a margin of safety.

In summary, the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The proposed changes result in more restrictive surveillance conditions than currently required in the Technical Specifications. The Commission has provided guidance concerning the application of the standards by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve a significant hazards consideration. Example (ii) of the commission guidance of amendments likely to involve no significant hazards consideration states: "A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications: For example, a more stringent surveillance requirement". Since the proposed changes are more restrictive than the current operating conditions in the Technical Specifications, the above cited example can be applied to this aspect of the amendment.

Based upon the preceding analysis, Duke Power Company concludes that the proposed amendments do not involve a significant hazards consideration.