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MEYER, D.L.

Rules & Directives Review Branch (Post 920323)

SUBJECT: Comment to proposed GL, "Guidance for Mod of TS to Reflect 10CFR20 Changes." Util strongly urges that Specification be reworded to remove requirement to submit entire ODCM for partial changes.

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58FR 68170

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FEB 25 1994

Mr. David L. Meyer, Chief  
Rules Review and Directives Branch  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION  
COMMENTS TO PROPOSED GENERIC LETTER  
TITLED 'GUIDANCE FOR MODIFICATIONS OF  
TECHNICAL SPECIFICATIONS TO REFLECT  
10CFR20 CHANGES, ET AL'

PLA-4093 FILES R41-2/A17-11

Docket Nos. 50-387  
and 50-388

Dear Mr. Meyer:

Pennsylvania Power and Light Company (PP&L) is submitting the following comments to the Federal Register notice concerning the proposed Generic Letter titled "Guidance for Modification of Technical Specifications to Reflect (A) Revisions to 10CFR20, "Standards For Protection Against Radiation" and 10CFR50.36a, "Technical Specification on Effluents from Nuclear Power Reactors", (B) Related Current Industry Initiatives, and (C) Miscellaneous Related Editorial Clarifications" (58FR68170).

- Enclosure 1, Section 6.11.2.A.(i) - "...under the administrative control of the *shift foreman* or the health physics ..." A clarification of "shift foreman" is necessary to specify that this individual be a Health Physics or Radiation Protection shift foreman.
- Enclosure 1, Section 6.11 (footnotes) - "\*\*At 30 centimeters from the radiation source or from any surface penetrated by the radiation." and "\*\*\*At 1 meter from the radiation source or from any surface penetrated by the radiation." The words "accessible to personnel" have been omitted in referring to radiation sources. This distinction is important and necessary and is clearly stated in the 10CFR20 definitions for radiation, high radiation and very high radiation areas.

Also the use of footnotes tends to make a document less easy to interpret and refer to. It would be more helpful to include the appropriate words in the text itself or provide the full definitions in the definitions section.

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- Enclosure 1, Section 6.14.c. - "(Changes to the ODCM) . . . shall be submitted to the Commission in the form of a complete copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release report for the period in which any change to the ODCM was made. Each change shall be identified in the margin . . . and shall indicate the date (e.g., month/year) the change was implemented". It appears to us that the proposed Specification has the potential to increase the size of submittal without adding any value of information. Also, it is unclear whether or not only one copy for the affected period is to be submitted when multiple revisions have occurred within the period. We strongly urge that this Specification be reworded to remove the requirement to submit the entire ODCM copy for partial changes. We believe that better archiving is achieved with the process in the current Specification: only the changed sections of the ODCM for the affected period, which includes superseded revisions, are submitted.
- Enclosure 2, Section 6.8.4.g.(5) - "Determination of cumulative and projected dose contributions from radioactive effluents for the current year and current calendar (shall be made) in accordance with the methodology and parameters of the ODCM at least every 31 days." It is not clear, however, whether it is intended here for *dose projections* to be performed for the current calendar quarter and year, or for 31 days. This section should be clarified regarding the dose projection period.

PP&L appreciates the opportunity to comment on this proposed Generic Letter.

Very truly yours,



R. G. Byram

cc: NRC Document Control Desk (original)  
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Mr. R. J. Clark, NRC Sr. Project Manager