

G. MARKED UP TECHNICAL SPECIFICATION PAGE 5.5-2

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5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include recirculation portion of the high pressure injection system, the shutdown cooling portion of the low pressure safety injection system, the post-accident sampling subsystem of the reactor coolant sampling system, the containment spray system, ~~the post-accident sampling return piping of the radioactive waste gas system, the post-accident sampling return piping of the liquid radwaste system,~~ and the post-accident containment atmosphere sampling piping of the hydrogen monitoring subsystem. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

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Enclosure 2

**Proposed Amendment to Palo Verde
Technical Specification 5.6.2,
Annual Radiological Environmental Operating Report**

A. DESCRIPTION OF THE TECHNICAL SPECIFICATION AMENDMENT REQUEST

This proposed Technical Specification (TS) amendment would delete the administrative requirement in TS 5.6.2, Annual Radiological Environmental Operating Report, that states: "[t]he report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result." In NRC Press Release number 98-08, dated January 13, 1998, the NRC announced that they ended their contract with 34 states to perform radiation monitoring around certain nuclear facilities at the end of 1997. Arizona was one of those states, and PVNGS was one of the nuclear facilities monitored. The discontinued monitoring program is the TLD program listed in TS 5.6.2. Since the NRC TLD program no longer exists, this change will delete the administrative requirement that refers to that program.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The reporting requirement in TS 5.6.2 specifies that APS submit an Annual Radiological Environmental Operating Report covering the operation of the units during the previous calendar year. The Annual Radiological Environmental Operating Report must include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the Offsite Dose Calculation Manual (ODCM).

The current TS 5.6.2 also requires that the Annual Radiological Environmental Operating Report identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result. However, the NRC ended their TLD program at the end of 1997, so this requirement is not achievable.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

Technical Specification 5.6.2 contains administrative reporting requirements that can no longer be achieved because the referenced NRC program no longer exists. In NRC Press Release number 98-08, dated January 13, 1998, the NRC announced that they ended their contract with 34 states to perform radiation monitoring around certain nuclear facilities at the end of 1997. Arizona was one of those states, and PVNGS was one of the nuclear facilities monitored. The discontinued monitoring program is the TLD program listed in TS 5.6.2. Since the NRC TLD program no longer exists, this change will delete the administrative requirement that refers to that program.

**D. SAFETY ANALYSIS FOR THE TECHNICAL SPECIFICATION
AMENDMENT REQUEST**

Technical Specification 5.6.2 identifies the information that must be submitted to the NRC in the Annual Radiological Environmental Operating Report. This change to TS 5.6.2 will only delete the requirement to include in that report information which is no longer available. The NRC ended their TLD radiation monitoring program around certain plants, including Palo Verde, at the end of 1997, and this administrative change will delete the administrative requirement in TS 5.6.2 to report TLD results in relation to that program. The requirements of TS 5.6.2 and the changes being made with this request are purely administrative reporting requirements, and have no effect on the design, operation, or maintenance of the plant.

Since this proposed change is a purely administrative change to reporting requirements, no equipment, including equipment important to safety, would be affected by this proposed change. There would be no change in the physical design, construction, operation, or maintenance of the plant and no equipment function would be changed. The proposed change is to remove a reference to an NRC reporting requirement that no longer exists. Therefore, the proposed change would have no impact the existing safety analysis of the plant.

E. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Standard 1 -- Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

No – This proposed administrative change to Technical Specification (TS) 5.6.2 does not involve a significant increase in the probability or consequences of an accident previously evaluated. This proposed TS amendment would delete the administrative requirement in TS 5.6.2, Annual Radiological Environmental Operating Report, that states: “[t]he report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result.” The NRC ended their TLD program at the end of 1997. The requirements of TS 5.6.2 and the changes being made with this request are purely administrative reporting requirements that have no effect on the design, operation, or maintenance of the plant. Since there is no effect on the design, operation, or maintenance of the plant, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Standard 2 -- Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

No – This proposed administrative change to TS 5.6.2 does not create the possibility of a new or different kind of accident from any accident previously evaluated. This change only affects administrative reporting requirement and

has no effect on the design, operation, or maintenance of the plant. Since this proposed change is purely administrative and would have no effect on the design, operation, or maintenance of the plant, this change will not create possibility of a new or different type of accident than any previously evaluated.

Standard 3 -- Does the proposed change involve a significant reduction in a margin of safety?

No – This proposed administrative change to TS 5.6.2 does not involve a significant reduction in a margin of safety. This TS establishes requirements for reporting radiological monitoring information to the NRC. Since TS 5.6.2 contains an administrative reporting requirement, and this proposed change would simply delete an administrative requirement associated with a discontinued NRC monitoring program, there is no margin of safety associated this TS or with the proposed changes to the requirements of TS 5.6.2. Also, since this involves only administrative reporting, this change has no affect on any other margin of safety.

F. ENVIRONMENTAL CONSIDERATION

APS has determined that the proposed amendment involves no changes in the amount or type of effluent that may be released offsite, and results in no increase in individual or cumulative occupational radiation exposure. As described above, the proposed TS amendment involves no significant hazards consideration and, as such, meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).

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5.6 Reporting Requirements (continued)

5.6.2 Annual Radiological Environmental Operating Report (continued)

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. The report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

-----NOTE-----
A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste system, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the shutdown cooling system suction line relief valves or pressurizer safety valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

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