

ATTACHMENT 2 TO AEP:NRC:1315

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 1

3/4 7-26
3/4 7-27
B 3/4 7-5
B 3/4 7-5a

9812080066 981203
PDR ADDCK 05000315
P PDR

PLANT SYSTEMS

3/4.7.7 SEALED SOURCE CONTAMINATION

LIMITING CONDITION FOR OPERATION

3.7.7.1 Each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material, shall be free of ≥ 0.005 microcuries of removable contamination.

APPLICABILITY: At all times.

ACTION

- a. Each sealed source with removable contamination in excess of the above limits shall be immediately withdrawn from use and:
 1. Either decontaminated and repaired, or
 2. Disposed of in accordance with Commission Regulations.
- b. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.7.1.1 Test Requirements - Each sealed source shall be tested for leakage and/or contamination by:

- a. The licensee, or
- b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample.

4.7.7.1.2 Test Frequencies - Each category of sealed sources shall be tested at the frequency described below.

- a. Sources in use (excluding startup sources previously subjected to core flux) - At least once per six months for all sealed sources containing radioactive materials.

and fission detectors

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

1. With a half-life greater than 30 days (excluding Hydrogen 3), and
2. In any form other than gas. (and fission detector)
- b. Stored sources not in use - Each sealed source shall be tested prior to use or transfer to another licensee unless tested within the previous six months. Sealed sources transferred without a certificate indicating the last test date shall be tested prior to being placed into use. (and fission detectors) (and fission detector)
- c. Startup sources - Each sealed startup source shall be tested within 31 days prior to being subjected to core flux and following repair or maintenance to the source. (detector)

4.7.7.1.3 Reports - A Special Report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detection leakage tests reveal the presence of ≥ 0.005 microcuries of removable contamination.

3/4.7.5 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

The OPERABILITY of the control room emergency ventilation system ensures that the control room will remain habitable for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR 50.

The Unit 1 control room emergency ventilation system operates automatically on a Safety Injection Signal from either Unit 1 or Unit 2. The automatic start from Unit 2 is only available when the Unit 2 ESF actuation system is active in modes 1 through 4 in Unit 2.

The control room ventilation system normally maintains the control room at temperatures at which control room equipment is qualified for the life of the plant. Continued operation at the Technical Specification limit is permitted since the portion of time the temperature is likely to be elevated is small in comparison to the qualified life of the equipment at the limit.

3/4.7.6 ESF VENTILATION SYSTEM

The OPERABILITY of the ESF ventilation system ensures that adequate cooling is provided for ECCS equipment and that radioactive materials leaking from the ECCS equipment within the pump room following a LOCA are filtered prior to reaching the environment. The operation of this system and the resultant effect on offsite dosage calculations were assumed in the accident analyses.

The 1980 version of ANSI N510 is used as a testing guide. This standard, however, is intended to be rigorously applied only to systems which, unlike the ESF ventilation system, are designed to ANSI N509 standards. For the specific case of the air-aerosol mixing uniformity test required by ANSI N510 as a prerequisite to in-place leak testing of charcoal and HEPA filters, the air-aerosol uniform mixing test acceptance criteria were not rigorously met. For this reason, a statistical correction factor will be applied to applicable surveillance test results where required.

3/4.7.7 SEALED SOURCE CONTAMINATION

~~The limitations on sealed source removable contamination ensure that the total body or individual organ irradiation does not exceed allowable limits in the event of ingestion or inhalation of the probable leakage from the source material. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, are based on 10 CFR 70.39(c) limits for plutonium. Quantities of interest to this specification which are exempt from the leakage testing are consistent with the criteria of 10 CFR Parts 30.11-20.~~ This limitation

will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

3/4 BASES

3/4.7 PLANT SYSTEMS

3/4.7.7 SEALED SOURCE CONTAMINATION (Continued)

and 70.19. Leakage from sources excluded from the requirements of this specification is not likely to represent more than one maximum permissible body burden for total body irradiation if the source material is inhaled or ingested.

3/4.7.8 HYDRAULIC SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

ATTACHMENT 3 TO AEP:NRC:1315
PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES
UNIT 1

3/4 7-26
3/4 7-27
B 3/4 7-5
B 3/4 7-5a

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

3/4.7.7 SEALED SOURCE CONTAMINATION

LIMITING CONDITION FOR OPERATION

3.7.7.1 Each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material, shall be free of ≥ 0.005 microcuries of removable contamination.

APPLICABILITY: At all times.

ACTION

- a. Each sealed source with removable contamination in excess of the above limits shall be immediately withdrawn from use and:
 - 1. Either decontaminated and repaired, or
 - 2. Disposed of in accordance with Commission Regulations.
- b. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.7.1.1 Test Requirements - Each sealed source shall be tested for leakage and/or contamination by:

- a. The licensee, or
- b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample.

4.7.7.1.2 Test Frequencies - Each category of sealed sources shall be tested at the frequency described below.

- a. Sources in use (excluding startup sources and fission detectors previously subjected to core flux) - At least once per six months for all sealed sources containing radioactive materials.

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

1. With a half-life greater than 30 days (excluding Hydrogen 3), and
 2. In any form other than gas.
- b. Stored sources not in use - Each sealed source and fission detector shall be tested prior to use or transfer to another licensee unless tested within the previous six months. Sealed sources and fission detectors transferred without a certificate indicating the last test date shall be tested prior to being placed into use.
- c. Startup sources - Each sealed startup source and fission detector shall be tested within 31 days prior to being subjected to core flux and following repair or maintenance to the source.

4.7.7.1.3 Reports - A Special Report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of ≥ 0.005 microcuries of removable contamination.

3/4.7.5 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

The OPERABILITY of the control room emergency ventilation system ensures that the control room will remain habitable for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR 50.

The Unit 1 control room emergency ventilation system operates automatically on a Safety Injection Signal from either Unit 1 or Unit 2. The automatic start from Unit 2 is only available when the Unit 2 ESF actuation system is active in modes 1 through 4 in Unit 2.

The control room ventilation system normally maintains the control room at temperatures at which control room equipment is qualified for the life of the plant. Continued operation at the Technical Specification limit is permitted since the portion of time the temperature is likely to be elevated is small in comparison to the qualified life of the equipment at the limit.

3/4.7.6 ESF VENTILATION SYSTEM

The OPERABILITY of the ESF ventilation system ensures that adequate cooling is provided for ECCS equipment and that radioactive materials leaking from the ECCS equipment within the pump room following a LOCA are filtered prior to reaching the environment. The operation of this system and the resultant effect on offsite dosage calculations were assumed in the accident analyses.

The 1980 version of ANSI N510 is used as a testing guide. This standard, however, is intended to be rigorously applied only to systems which, unlike the ESF ventilation system, are designed to ANSI N509 standards. For the specific case of the air-aerosol mixing uniformity test required by ANSI N510 as a prerequisite to in-place leak testing of charcoal and HEPA filters, the air-aerosol uniform mixing test acceptance criteria were not rigorously met. For this reason, a statistical correction factor will be applied to applicable surveillance test results where required.

3/4.7.7 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, are based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

3/4 BASES
3/4.7 PLANT SYSTEMS

3/4.7.8 HYDRAULIC SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

ATTACHMENT 4 TO AEP:NRC:1315

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Evaluation of Significant Hazards Consideration

The licensee has evaluated this proposed amendment and determined that it involves no significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

1. involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;
2. create the possibility of a new or different kind of accident from any previously analyzed; or
3. involve a significant reduction in a margin of safety.

The licensee proposes to revise technical specification (T/S) 3/4.7.7, "Sealed Source Contamination," and its associated bases to address testing requirements for fission detectors. The proposed changes would provide consistency with the unit 2 T/S requirements and NUREG-0452, "Standard Technical Specifications."

The determination that the criteria set forth in 10 CFR 50.92 are met for this amendment request is indicated below.

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

The proposed changes clarify testing requirements for fission detectors. When the fission detectors are tested for surface contamination, they do not interface with plant equipment and they do not affect plant operation. The detectors are not assumed to initiate an accident; therefore, the probability of an accident previously evaluated is not changed.

Conducting tests prior to using a new fission detector provides assurance that intake limits will not be exceeded. There is no change to the nuclear material contained in the detector. The fission detectors are not used to mitigate the consequences of postulated accidents. Therefore, the consequences of an accident remain the same as previously evaluated.

Therefore, it is concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different type of accident from any accident previously evaluated?

The proposed changes do not affect the design or operation of systems, structures, or components in the plant. There are no changes to parameters governing plant operation, and no new or

different type of equipment will be installed. Therefore, it is concluded that the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The proposed changes do not introduce new equipment, equipment modifications, or new or different modes of plant operation. These changes do not affect the operational characteristics of any equipment or systems.

Therefore, it is concluded that these changes do not involve a significant reduction in the margin of safety.

In summary, based upon the above evaluation, the Licensee has concluded that these changes involve no significant hazards consideration.

ATTACHMENT 5 TO AEP:NRC:1315

ENVIRONMENTAL ASSESSMENT

Environmental Assessment

The Licensee has evaluated this license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. The Licensee has determined that this license amendment request meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or that changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria:

- (i) The amendment involves no significant hazards consideration.

As demonstrated in attachment 4, this proposed amendment does not involve any significant hazards consideration.

- (ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

As documented in attachment 1, there will be no change in the types or significant increase in the amounts of any effluents released offsite.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not result in significant changes in the operation or configuration of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels within the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from this change.

