

# CATEGORY 1

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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH. NAME      AUTHOR AFFILIATION  
 HOVEY, R.J.      Florida Power & Light Co. *See Proposed Change To Tech Specs.*  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
                          Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-31 & DPR-41, revising  
 TS such that requirements for Radiological Effluent controls  
 relocated to Offsite Dose Calculation Manual or Process  
 Control Program.

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10 CFR §50.36  
10 CFR §50.90

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
License Nos. DPR-31 and DPR-41  
Proposed License Amendments  
Relocation of Radiological Effluent  
Technical Specifications Using the  
Guidance of Generic Letter 89-01

In accordance with 10 CFR §50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to modify the Turkey Point Units 3 & 4 Technical Specifications.

The purpose of this amendment is to revise the Technical Specifications such that the requirements for Radiological Effluent controls are relocated to the Offsite Dose Calculation Manual or the Process Control Program, as appropriate. These changes are being proposed in accordance with NRC Generic Letter (GL) 89-01, "Implementation of Programmatic Controls for Radioactive Effluent Technical Specifications," and NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Controls for Pressurized Water Reactors." In addition, new programmatic controls for radioactive effluent and radiological environmental monitoring have been added to the Administrative Controls section of the Technical Specifications. The wording in GL 89-01 has been incorporated in these amendments except where more recent guidance has been provided in NUREG-1431, Rev. 1, "Standard Technical Specifications - Westinghouse Plants."

Technical Specifications (TS) requirements for Gas Decay Tanks and Explosive Gas Mixture have also been relocated from Section 3/4.11, "Radioactive Effluents," of the TS into the plant systems section of TS. These two TS requirements are proposed to be relocated within the Turkey Point TS to facilitate the proposed radiological effluent programmatic controls.

A description of the amendments request is provided in Attachment 1. FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR §50.92. The no significant hazards determination in support of the proposed Technical Specification changes is provided in Attachment 2. Attachment 3 provides the proposed revised TS. Enclosure 1 is the complete revised version

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of the Offsite Dose Calculation Manual and those pages of 0-HPA-045, "Process Control Program" which contain the Technical Specification requirements which are proposed to be removed.

Note that the NRC recently forwarded to FPL, "Turkey Point Units 3 and 4 - Technical Evaluation Report Regarding the Offsite Dose Calculation Manual (ODCM), Revision 4 (TAC Nos. M82732 and M82733)," dated September 29, 1995. Changes suggested by the Technical Evaluation Report have been incorporated in Enclosure 1. A summary of the changes and specific locations in the ODCM are included in Attachment 4. The bases for the pathway dose transfer factors in Appendix A of the ODCM are under discussion with NRC staff and reviewers. The Appendix A tables were derived in the early 1970's and the basis for these will be reconstituted.

In accordance with 10 CFR §50.91(b)(1), a copy of these proposed license amendments is being forwarded to the State Designee for the State of Florida.

The proposed license amendments have been reviewed by Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

Should there be any questions concerning this amendment request, please contact us.

Very truly yours,



Robert J. Hovey  
Vice President  
Turkey Point Plant

CDV/JEK

Attachments  
Enclosure

cc: S. D. Ebnetter, Regional Administrator, Region II, USNRC  
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey  
Point Plant  
W. A. Passetti, Florida Department of Health and  
Rehabilitative Services



STATE OF FLORIDA           )  
                                  ) ss.  
COUNTY OF DADE           )

Robert J. Hovey being first duly sworn, deposes and says:


That he is Vice President, Turkey Point Plant, of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

  
Robert J. Hovey

Subscribed and sworn to before me this

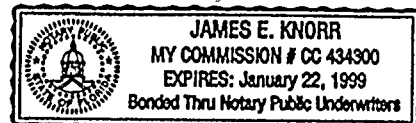
21 day of March, 1996.

  
James E. Knorr  
Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of Dade, State of Florida

My Commission expires Jan. 22, 1999  
Commission No. CC 434300

Robert J. Hovey is personally known to me.



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ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

**Description and Purpose**

These proposed license amendments have been developed utilizing the guidance of NRC Generic Letter (GL) 89-01, "Implementation of Programmatic Controls for Radioactive Effluent Technical Specifications", and NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Controls for Pressurized Water Reactors." As such, the procedural details of the Radiological Effluent Technical Specifications (RETS) have been relocated to the Offsite Dose Calculation Manual (ODCM) or Process Control Program (PCP), as appropriate.

The ODCM has been revised to reflect the proposed changes to the Administrative Controls section of the Technical Specifications (TS) so that it may be implemented immediately upon issuance of these amendments. Wherever possible, the standard TS wording of NUREG-1301 was used in the controls section of the ODCM. Some deviations from the wording and format guidance of NUREG-1301 have been made to reflect Turkey Point specific conditions; however, no changes in technical content or previous TS requirements have been made.

Wherever applicable, the wording of GL 89-01 was replaced by the more recent wording used in NUREG-1431, Rev. 1, "Standard Technical Specifications - Westinghouse Plants."

These proposed license amendments for Turkey Point Units 3 and 4 TS are intended to accomplish the following:

1. Incorporate programmatic controls for RETS in the Administrative Controls section of the TS that satisfy the requirements of 10 CFR §20.1302, 40 CFR Part 190, 10 CFR §50.36(a), and Appendix I to 10 CFR Part 50.
2. Relocate the procedural details in current TS involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring and radiological reporting details to the ODCM.
3. Relocate the definition of solidification and existing procedural details in the current TS on solid radioactive wastes to the PCP.
4. Simplify the associated reporting requirements.
5. Simplify the administrative controls for changes to the ODCM and PCP.

6. Include record retention requirements for changes to the ODCM and the PCP.
7. Relocate and revise the definitions of the ODCM and the PCP to be consistent with the changes discussed above as well as NUREG-1431, Rev. 1.

### Background

In GL 89-01, the NRC staff stated that it had examined the contents of the RETS in relation to the Interim Policy Statement on Technical Specifications Improvements. The NRC staff concluded that programmatic controls could be implemented in the Administrative Controls section of the TS to satisfy existing regulatory requirements for RETS. The NRC also determined that the operational and surveillance requirements of the current TS could be relocated to the ODCM and PCP, as appropriate. The purpose of these proposed license amendments is to simplify the RETS while also meeting regulatory requirements for radioactive effluents and radioactive effluent monitoring. These changes will implement the recommendations made in GL 89-01, NUREG-1301 and NUREG-1431, Rev. 1.

The Gas Decay Tank System and Explosive Gas Mixture requirements are moved from Section 3/4.11 of the Turkey Point TS and placed in Section 3/4.7 of the Turkey Point TS.

### Discussion and Description of Proposed Changes

Note, Table 1 of this attachment is a TS change disposition cross reference.

The following changes in Turkey Point Technical Specifications are proposed:

1. TS Index: UPDATE the Index to reflect the removal of TS 3/4 3.3.4 and Table 3.3-6 which were removed in an earlier submittal, but not removed from the Index. DELETE TS 1.15, TS 1.16, TS 1.21, TS 3/4 3.3.5, TS Table 3.3-7, Table 4.3-5, TS 3/4 3.3.6, Table 3.3-8, and Table 4.3-6 references in the Index. ADD new Sections for TS 3/4.7.8 and 3/4.7.9. DELETE TS 3/4.11, TS 3/4.12, and TS 6.15 Index references.

Justification: The Turkey Point TS Index should be revised to reflect the changes requested by the proposed license amendments.

2. TS 1.15, "Member(s) of the Public": DELETE the definition for "Member(s) of the Public".

Justification:

This definition is contained in 10 CFR Part 20 and also resides in the ODCM. Title 10 CFR §50.36 does not require this definition to be contained in the Turkey Point TS. Therefore, FPL proposes to remove the definition from the TS.

## 10 CFR §50.36 Applicability

On July 17, 1995 (60 FR 36953), the Nuclear Regulatory Commission (NRC) amended its regulations pertaining to TS for nuclear power reactors. The rule codifies criteria for determining the content of TS. Licensees may voluntarily use the criteria as a basis to propose the relocation of existing TS that do not meet any of the criteria from the facility license to licensee-controlled documents. The rule's set of objective criteria for determining which regulatory requirements and operating restrictions should be included in TS are addressed below as related to the proposed amendments.

- (A) *Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

### Criterion 1 Analysis

All instrumentation required by current TS will continue to be addressed and required by the Turkey Point Units 3 and 4 TS. The proposed changes will revise the Turkey Point Units 3 and 4 TS to remove the definition for Member(s) of the Public. These amendments do not propose changes to the TS affecting instruments specifically installed to detect excessive reactor coolant system leakage or instrumentation installed to detect significant abnormal degradation of the reactor coolant pressure boundary.

- (B) *Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

### Criterion 2 Analysis

Process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation, will continue to be maintained as currently included in the Turkey Point TS. Additionally, active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (pressure/temperature limits), as currently included in the TS, are not affected by these amendments. The amendments will remove the definition of Member(s) of the Public. No physical modifications to the facility are required to implement these proposed amendments.

- (C) *Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Criterion 3 Analysis

Structures, systems, and components that are part of the primary success path of the safety sequence analysis, as well as those support and actuation systems that are necessary for items in the primary success path to successfully function, are unaffected by these amendments. The amendments will remove the definition for Member(s) of the Public from the TS. No physical modifications to the facility are required to implement these proposed amendments.

- (D) *Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.*

Criterion 4 Analysis

The Turkey Point TS which address systems for which operating experience and probabilistic safety assessment have generally shown to be significant to public health and safety and any other structures, systems, or components that meet this criterion are not impacted by the proposed license amendments. The amendments will delete the definition for Member(s) of the Public. No physical modifications to the facility are required to implement these proposed amendments.

Summary

The proposed revisions to Turkey Point Units 3 and 4 TS are administrative in nature. Since, the definition for Member(s) of the Public is not a part of the TS required by 10 CFR §50.36, and the definition does not appear in NUREG 1431, Rev.1, the definition may be removed from the TS. The definition does appear in 10 CFR Part 20 and also resides in the ODCM. Therefore, FPL proposes to delete the definition from the TS.

3. TS 1.16, "OFFSITE DOSE CALCULATION MANUAL": RELOCATE the definition of the ODCM.

Justification: The definition of the ODCM has been moved to Administrative Controls section, and is included as part of the program description, TS 6.14.1. The wording is in accordance with the guidance of GL 89-01, and NUREG-1431, Rev 1, and relocation is per the guidance of NUREG-1431, Rev 1.

4. TS 1.21, "PROCESS CONTROL PROGRAM": RELOCATE the definition of the PCP.

Justification: The definition of the PCP has been moved to Administrative Controls section, and is included as part of the

program description, TS 6.13.1. The wording is in accordance with the guidance of GL 89-01. NUREG-1431, Rev. 1, does not address the PCP, however this relocation is consistent with the ODCM definition change above.

5. Table 3.3-3, Table Notations (2), "ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION TRIP SETPOINTS": REVISE the reference to TS 3.11.2.1 to refer to the ODCM.

Justification: Since TS 3.11.2.1 requirements have been relocated to the ODCM, the reference for the allowable limits has been changed to the ODCM.

6. Table 3.3-4, Note 2, "RADIATION MONITORING INSTRUMENTATION FOR PLANT OPERATION": REVISE the reference to TS 3.11.2.1 to refer to the ODCM.

Justification: Since TS 3.11.2.1 requirements have been relocated to the ODCM, the reference for the allowable limits has been changed to the ODCM.

7. TS 3/4.3, "INSTRUMENTATION": DELETE TS 3.3.4 (Blank Pages), Table 3.3-6 (Blank Page).

Justification: These pages have been deleted to reflect the removal of the remainder of section 3/4.3. The pages had been retained to provide for consistent pagination. This pagination is no longer required.

8. TS 3/4.3, "INSTRUMENTATION": DELETE TS 3.3.3.5, TS 4.3.3.5, Table 3.3-7 and Table 4.3-5, REVISE TS 3.3.3.6, TS 4.3.3.6, Table 3.3-8, and Table 4.3-6.

Justification: The requirements deleted have been relocated to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls for this instrumentation has been located in TS 6.8.4f, Item 1. Those items remaining in TS 3.3.3.6, TS 4.3.3.6, Table 3.3-8, and Table 4.3-6 are being revised in accordance with GL 89-01 and NUREG-1301. The changes involve a removal of the reference to radioactive effluent monitoring and retention of only explosive gas monitoring requirements. These amendments would also add a requirement for a special report to be submitted within 30 days of the failure to restore the inoperable explosive gas monitor channel within 30 days explaining the inoperability timely correction difficulties. The reporting requirement added is done to conform to the wording in GL 89-01.

#### 10 CFR §50.36 Applicability

- (A) *Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

### Criterion 1 Analysis

All instrumentation required by current TS will continue to be addressed and required by the Turkey Point Units 3 and 4 TS. The proposed changes will revise the Turkey Point Units 3 and 4 TS to remove the TS requirements for radioactive effluent monitoring instrumentation. These requirements have been relocated to the ODCM. These amendments do not propose changes to the TS affecting instruments specifically installed to detect excessive reactor coolant system leakage or instrumentation installed to detect significant abnormal degradation of the reactor coolant pressure boundary.

- (B) *Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

### Criterion 2 Analysis

Process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation, will continue to be maintained as currently included in the Turkey Point TS. Additionally, active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (pressure/temperature limits), as currently included in the TS, are not affected by these amendments. The amendments will remove the TS requirements for radioactive effluent monitoring instrumentation. No physical modifications to the facility are required to implement these proposed amendments.

- (C) *Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

### Criterion 3 Analysis

Structures, systems, and components that are part of the primary success path of the safety sequence analysis, as well as those support and actuation systems that are necessary for items in the primary success path to successfully function, are unaffected by these amendments. The amendments will remove the TS requirements for radioactive effluent monitoring instrumentation. No physical modifications to the facility are required to implement these proposed amendments.

- (D) *Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.*



#### Criterion 4 Analysis

The Turkey Point TS which address systems for which operating experience and probabilistic safety assessment have generally shown to be significant to public health and safety and any other structures, systems, or components that meet this criterion are not impacted by the proposed license amendments. The amendments will remove the TS requirements for radioactive effluent monitoring instrumentation. No physical modifications to the facility are required to implement these proposed amendments.

#### Summary

The proposed revisions to Turkey Point Units 3 and 4 TS are administrative in nature. These requirements have been relocated to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls for this instrumentation have been located in TS 6.8.4f, Item 1. Those items remaining in TS 3.3.3.6, TS 4.3.3.6, Table 3.3-8, and Table 4.3-6 are being revised in accordance with GL 89-01 and NUREG-1301. The changes involve a removal of the requirements for radioactive effluent monitoring and retention of only explosive gas monitoring requirements. These amendments would also add a requirement for a special report to be submitted within 30 days of the failure to restore the inoperable explosive gas monitoring channel explaining the inoperability timely correction difficulties.

9. TS 3/4.11, "RADIOACTIVE EFFLUENTS":      DELETE TS 3/4.11.1.1, TABLE 4.11-1, TS 3/4.11.1.2, TS 3/4.11.1.3, TS 3/4.11.2.1, TABLE 4.11-2, TS 3/4.11.2.2, TS 3/4.11.2.3, TS 3/4.11.2.4, TS 3/4.11.3, and TS 3/4.11.4:

Justification: These radioactive effluent requirements have been relocated to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls are included in TS 6.8.4f (Items 2, thru 10.)

#### 10 CFR §50.36 Applicability

- (A) *Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

#### Criterion 1 Analysis

All instrumentation required by current TS will continue to be addressed and required by the Turkey Point Units 3 and 4 TS. The proposed changes will revise the Turkey Point Units 3 and 4 TS to relocate these requirements to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls included in TS 6.8.4f (Items 2, thru 10.) remove the TS requirements for radioactive effluent monitoring instrumentation. These amendments do not propose changes to the TS affecting instruments specifically installed to detect excessive reactor





coolant system leakage or instrumentation installed to detect significant abnormal degradation of the reactor coolant pressure boundary.

- (B) *Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

#### Criterion 2 Analysis

Process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation, will continue to be maintained as currently included in the Turkey Point TS. Additionally, active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (pressure/temperature limits), as currently included in the TS, are not affected by these amendments. The amendments will relocate the present TS requirements concerning radioactive effluents to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. The programmatic controls will be included in TS 6.8.4f (Items 2, thru 10.) No physical modifications to the facility are required to implement these proposed amendments.

- (C) *Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

#### Criterion 3 Analysis

Structures, systems, and components that are part of the primary success path of the safety sequence analysis, as well as those support and actuation systems that are necessary for items in the primary success path to successfully function, are unaffected by these amendments. The amendments will relocate the present TS requirements to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls for these requirements will be included in TS 6.8.4f (Items 2, thru 10.) No physical modifications to the facility are required to implement these proposed amendments.

- (D) *Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.*

#### Criterion 4 Analysis

The Turkey Point TS which address systems for which operating experience and probabilistic safety assessment have generally shown to be significant to public health and safety and any other structures, systems, or components that meet this criterion are

not impacted by the proposed license amendments. The amendments will relocate the TS requirements to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls for these TS requirements will be included in TS 6.8.4f (Items 2, thru 10.) No physical modifications to the facility are required to implement these proposed amendments.

#### Summary

The proposed revisions to Turkey Point Units 3 and 4 TS are administrative in nature. The systems and processes in TS 3.11.1.1, TS 4.11.1.1.1, TS 4.11.1.1.2, Table 4.11-1, TS 3.11.1.2, TS 4.11.1.2, TS 3.11.1.3, TS 4.11.1.3.1, TS 4.11.1.3.2, TS 3.11.2.1, TS 4.11.2.1.1, TS 4.11.2.1.2, Table 4.11-2, TS 3.11.2.2, TS 4.11.2.2, TS 3.11.2.3, TS 4.11.2.3, TS 3.11.2.4, TS 4.11.2.4.1, TS 4.11.2.4.2, TS 3.11.3, TS 4.11.3.1, TS 4.11.3.2, TS 3.11.4, TS 4.11.4.1 and TS 4.11.4.2, have been relocated to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls are included in TS 6.8.4f (Items 2, thru 10.)

10. TS 3/4.12, "RADIOLOGICAL ENVIRONMENTAL MONITORING":  
DELETE TS 3/4.12.1, TABLE 3.12-1, TABLE 3.12-2, TABLE 4.12-1, TS  
3/4.12.2, TS 3/4.12.3,:

Justification: These Radiological Environmental Monitoring requirements have been relocated to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls are included in TS 6.8.4g (Items 1, 2, and 3.)

#### 10 CFR §50.36 Applicability

- (A) *Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

#### Criterion 1 Analysis

All instrumentation required by current TS will continue to be addressed and required by the Turkey Point Units 3 and 4 TS. The proposed changes for these Radiological Environmental Monitoring requirements have been relocated to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls are included in TS 6.8.4g (Items 1, 2, and 3.) These amendments do not propose changes to the TS affecting instruments specifically installed to detect excessive reactor coolant system leakage or instrumentation installed to detect significant abnormal degradation of the reactor coolant pressure boundary.

- (B) *Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

### Criterion 2 Analysis

Process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation, will continue to be maintained as currently included in the Turkey Point TS. Additionally, active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (pressure/temperature limits), as currently included in the TS, are not affected by these amendments. The amendments will relocate the present TS Radiological Environmental Monitoring requirements to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls are included in TS 6.8.4g (Items 1, 2, and 3.) No physical modifications to the facility are required to implement these proposed amendments.

- (C) *Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

### Criterion 3 Analysis

Structures, systems, and components that are part of the primary success path of the safety sequence analysis, as well as those support and actuation systems that are necessary for items in the primary success path to successfully function, are unaffected by these amendments. The amendments will relocate the present TS Radiological Environmental Monitoring requirements to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls will be included in TS 6.8.4g (Items 1, 2, and 3.) No physical modifications to the facility are required to implement these proposed amendments.

- (D) *Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.*

### Criterion 4 Analysis

The Turkey Point TS which address systems for which operating experience and probabilistic safety assessment have generally shown to be significant to public health and safety and any other structures, systems, or components that meet this criterion are not impacted by the proposed license amendments. The amendments will relocate the TS Radiological Environmental Monitoring requirements to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls will be included in TS 6.8.4g (Items 1, 2, and 3.) No physical modifications to the facility are required to implement these proposed amendments.



### Summary

The proposed revisions to Turkey Point Units 3 and 4 TS are administrative in nature. These Radiological Environmental Monitoring requirements, the systems or processes specified in TS 3.12.1, TS 4.12.1, Table 3.12-1, Table 3.12-2, Table 4.12-1 TS 3.12.2, TS 4.12.2, TS 3.12.3, and TS 4.12.3, have been relocated to the ODCM in accordance with guidance from GL 89-01 and NUREG-1301. Programmatic controls are included in TS 6.8.4g (Items 1, 2, and 3.)

11. TS 3/4.11.2.5, "Radioactive Effluents: Explosive Gas Mixture" And 3/4.11.2.6, "Radioactive Effluents: Gas Decay Tanks.": RELOCATE TO NEW TECHNICAL SPECIFICATION TS 3/4.7.8 AND 3/4.7.9 respectively.

Justification: Section 3/4.11, "RADIOACTIVE EFFLUENTS," will no longer exist due to the removal of Radiological Effluent Technical Specifications and their relocation to the ODCM or PCP. The specifications for explosive gas mixture and the gas decay tank will be retained in the 3/4.7, "PLANT SYSTEMS," section. TS 3.11.2.5, TS 4.11.2.5, TS 3.11.2.6 and TS 4.2.11.6 will be relocated and renumbered as TS 3.7.8, TS 4.7.8, TS 3.7.9 and TS 4.7.9 respectively.

12. TS 6.8, "Procedures and Programs": ADD TS 6.8.4f, "Radiological Effluents Controls Program", and 6.8.4g, "Radiological Environmental Monitoring Program", to TS 6.8.4 as shown in Attachment 3.

Justification: This addition will incorporate programmatic controls in the Administrative Controls section of the TS that satisfy the requirements of 10 CFR §20.1302, 40 CFR Part 190, 10 CFR §50.36(a), and Appendix I to 10 CFR Part 50. The wording has been changed to be in accordance with NUREG-1431, Rev. 1, NUREG-1301 and GL 89-01. TS 6.8.4f.7, has been worded to retain the content of the present ODCM.

13. TS 6.9.1.3, "Annual Radiological Environmental Operating Report": REVISE TS 6.9.1.3 to simplify the existing specification and relocate the existing reporting details to the ODCM or PCP as appropriate and to provide the report by May 15 rather than May 1.

Justification: The details of reporting requirements are now contained within the ODCM or PCP and therefore do not need a detailed description as in the existing specification. The wording and report due date have been changed to be in accordance with NUREG-1431, Rev. 1, and GL 89-01.

14. TS 6.9.1.4, "Annual Radioactive Effluent Release Report": REVISE TS 6.9.1.4 to simplify the existing specification and relocate the existing reporting details to the ODCM.

Justification: The details of reporting requirements are now contained within the ODCM and therefore do not need a detailed

description in the specification. The wording has been changed to be in accordance with NUREG-1431, Rev. 1, and GL 89-01.

15. TS 6.10.3, "Record Retention": ADD TS 6.10.3q as shown in Attachment 3.

Justification: This addition is provided to include record retention requirements for changes to the ODCM and the PCP in the Technical Specifications.

16. TS 6.13, "Process Control Program": REVISE TS 6.13 as shown in Attachment 3.

Justification: The purposes of this change are to remove the requirement that licensee-initiated changes to the PCP be submitted to the Commission in the Annual Radioactive Effluent Release Report and to incorporate the description of the program previously found in the Definitions section (TS 1.21) into TS 6.13 utilizing the wording from GL 89-01. The reporting requirements are no longer required as noted by the absence of the requirement in GL 89-01 and NUREG-1431, Rev. 1.

#### 10 CFR §50.36 Applicability

- (A) *Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

#### Criterion 1 Analysis

All instrumentation required by current TS will continue to be addressed and required by the Turkey Point Units 3 and 4 TS. The proposed changes remove the requirement that licensee-initiated changes to the PCP be submitted to the Commission in the Annual Radioactive Effluent Release Report. The reporting requirements are no longer required as noted by the absence of the requirement in GL 89-01 and NUREG-1431, Rev. 1. These amendments do not propose changes to the TS affecting instruments specifically installed to detect excessive reactor coolant system leakage or instrumentation installed to detect significant abnormal degradation of the reactor coolant pressure boundary.

- (B) *Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

#### Criterion 2 Analysis

Process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation, will continue to be maintained as currently included in the Turkey Point TS. Additionally,





active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (pressure/temperature limits), as currently included in the TS, are not affected by these amendments. The amendments will remove the requirement that licensee-initiated changes to the PCP be submitted to the Commission in the Annual Radioactive Effluent Release Report. The reporting requirements are no longer required as noted by the absence of the requirement in GL 89-01 and NUREG-1431, Rev. 1. No physical modifications to the facility are required to implement these proposed amendments.

- (C) *Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

#### Criterion 3 Analysis

Structures, systems, and components that are part of the primary success path of the safety sequence analysis, as well as those support and actuation systems that are necessary for items in the primary success path to successfully function, are unaffected by these amendments. The amendments will remove the requirement that licensee-initiated changes to the PCP be submitted to the Commission in the Annual Radioactive Effluent Release Report. The reporting requirements are no longer required as noted by the absence of the requirement in GL 89-01 and NUREG-1431, Rev. 1. No physical modifications to the facility are required to implement these proposed amendments.

- (D) *Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.*

#### Criterion 4 Analysis

The Turkey Point TS which address systems for which operating experience and probabilistic safety assessment have generally shown to be significant to public health and safety and any other structures, systems, or components that meet this criterion are not impacted by the proposed license amendments. The amendments will remove the requirement that licensee-initiated changes to the PCP be submitted to the Commission in the Annual Radioactive Effluent Release Report. The reporting requirements are no longer required as noted by the absence of the requirement in GL 89-01 and NUREG-1431, Rev. 1. No physical modifications to the facility are required to implement these proposed amendments.

#### Summary

The proposed revisions to Turkey Point Units 3 and 4 TS are administrative in nature. The removal of the requirement that



licensee-initiated changes to the PCP be submitted to the Commission in the Annual Radioactive Effluent Release Report is no longer required as noted by the absence of the requirement in GL 89-01 and NUREG-1431, Rev. 1.

19. TS 6.14, "Offsite Dose Calculation Manual": REVISE TS 6.14 as shown in Attachment 3.

Justification: The purpose of this change is to incorporate the definition of the manual previously found in the Definitions section and a description of the program into the Administrative Controls section, utilizing the wording from GL 89-01 and guidance from NUREG-1431 Rev. 1.

20. TS 6.15 "Major Changes to Liquid Gaseous and Solid Radwaste Treatment Systems": DELETE TS 6.15.

Justification: The existing TS requirements are contained in procedural details of the ODCM or PCP as appropriate in accordance with GL 89-01 and NUREG-1301.

#### 10 CFR §50.36 Applicability

- (A) *Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

#### Criterion 1 Analysis

All instrumentation required by current TS will continue to be addressed and required by the Turkey Point Units 3 and 4 TS. The proposed changes remove the existing TS requirements which are now contained in procedural details of the ODCM or PCP as appropriate in accordance with GL 89-01 and NUREG-1301. These amendments do not propose changes to the TS affecting instruments specifically installed to detect excessive reactor coolant system leakage or instrumentation installed to detect significant abnormal degradation of the reactor coolant pressure boundary.

- (B) *Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

#### Criterion 2 Analysis

Process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation, will continue to be maintained as currently included in the Turkey Point TS. Additionally, active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (pressure/temperature limits), as currently included in the TS,



are not affected by these amendments. The amendments will remove the existing TS requirements which are now contained in procedural details of the ODCM or PCP as appropriate in accordance with GL 89-01 and NUREG-1301. No physical modifications to the facility are required to implement these proposed amendments.

- (C) *Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

#### Criterion 3 Analysis

Structures, systems, and components that are part of the primary success path of the safety sequence analysis, as well as those support and actuation systems that are necessary for items in the primary success path to successfully function, are unaffected by these amendments. The amendments will remove the existing TS requirements which are now contained in procedural details of the ODCM or PCP as appropriate in accordance with GL 89-01 and NUREG-1301. No physical modifications to the facility are required to implement these proposed amendments.

- (D) *Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.*

#### Criterion 4 Analysis

The Turkey Point TS which address systems for which operating experience and probabilistic safety assessment have generally shown to be significant to public health and safety and any other structures, systems, or components that meet this criterion are not impacted by the proposed license amendments. The amendments will remove the existing TS requirements which are now contained in procedural details of the ODCM or PCP as appropriate in accordance with GL 89-01 and NUREG-1301. No physical modifications to the facility are required to implement these proposed amendments.

#### Summary

The proposed revisions to Turkey Point Units 3 and 4 TS are administrative in nature. The revision involves the removal of the existing TS requirements which are now contained in procedural details of the ODCM or PCP as appropriate in accordance with GL 89-01 and NUREG-1301.

#### Technical Specification Amendment Proposal Summary

The proposed revisions to Turkey Point Units 3 and 4 Technical Specifications are submitted using the guidance of GL 89-01, NUREG-1301 and NUREG-1431, Rev. 1. The technical content of the specifications, while transferred to the ODCM and PCP, is left unchanged. New

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Attachment 1  
Page 16

programmatic controls for radioactive effluents and radioactive effluent monitoring have been added to the Turkey Point TS, as well as further clarification to the definitions of the ODCM and PCP. The requirements for Gas Decay Tanks and Explosive Gas Mixture have been relocated within the Turkey Point TS to facilitate the deletion of the Radioactive Effluents section.

All changes that have resulted in the removal of requirements from the Technical Specifications have been evaluated against the four criteria in 10 CFR §50.36 and additionally have been included in Technical Specification program controls.



ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Description of Proposed License Amendments

Generic Letter (GL) 89-01, "Implementation of Programmatic Controls for Radioactive Effluent Technical Specifications," dated January 31, 1989, and NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Controls for Pressurized Water Reactors," published April 1991, provided guidance to licensees for the relocation of the Radiological Effluent Technical Specifications (RETS).

The sections would be removed in accordance with guidance of 10 CFR §50.36 and §50.36(a) on systems and requirements that must be included in the TS. These systems and requirements do not meet any of the four criterion for inclusion specified in 10 CFR §50.36.

The proposed amendments would relocate the LIMITING CONDITIONS FOR OPERATION (LCO) and SURVEILLANCE REQUIREMENTS associated with the RETS in accordance with GL 89-01, NUREG-1301, and NUREG-1431, Rev. 1.

Specifically, the definition in TS 1.15, "Members of the Public," would be deleted since it is already located in 10 CFR Part 20 and has been inserted into the ODCM. The definitions for the ODCM and Process Control Program (PCP) (TS 1.16 and TS 1.21) would be relocated to the Administrative Controls section of the TS. Two tables in the Instrumentation section of the TS have notes which now reference RETS sections. These amendments would reword those references to point to the ODCM for guidance on allowable limits. The blank pages for TS 3.3.4 and Table 3.3-6 would be removed to provide for consistent pagination. TS 3/4.3.3.5 and the radioactive gaseous effluent portion of TS 3/4.3.3.6 and associated tables, instrumentation operational conditions, remedial actions and surveillance requirements would be controlled through the ODCM or PCP and associated procedures. Future changes to the ODCM or PCP would be handled under the administrative controls for those programs. Technical Specification Administrative Control sections would contain the programmatic controls for the ODCM and PCP. The remaining portion of TS 3.3.3.6 would retain the operational conditions, remedial actions, and surveillance requirements for the explosive gas monitor instrumentation.

The procedural details of the current TS on radioactive effluents and radiological environmental monitoring (TS 3/4.11, and TS 3/4.12, except 3/4.11.2.5 and 3/4.11.2.6) would be deleted. All operational conditions, remedial actions and surveillance requirements presently in the Technical Specifications would be controlled through the ODCM or PCP.

An administrative change to the TS would include the relocation of TS 3/4.11.2.5 and TS 3/4.11.2.6 to sections 3/4.7.8 and 3/4.7.9 respectively, to allow for the deletion, in total, of sections 3/4.11 and 3/4.12 of the TS.

The INDEX and appropriate page numbers would be revised to reflect the





above changes.

New sections TS 6.8.4f and 6.8.4g would be added to provide programmatic controls for the Radiological Effluents Controls Program and the Radiological Environmental Monitoring Program.

TS 6.9.1.3 and TS 6.9.1.4 would be simplified and the reporting details now contained in these specifications would be relocated to the ODCM or PCP with the exception of the requirement to report licensee-initiated changes to the PCP in the Annual Radioactive Effluent Release Report.

New record retention requirements changes for the ODCM and PCP would be added to TS 6.10.3q.

In summary, as provided in the guidance, the technical content of the specifications which would be transferred to the ODCM or the PCP would be unchanged. New programmatic controls for radioactive effluents and radioactive effluent monitoring would be added to the Turkey Point TS, as well as further clarification to the definitions of the ODCM and PCP. The Technical Specification requirements for Gas Decay Tanks and Explosive Gas Mixture would be relocated to another section of the TS.

## **Introduction**

The Nuclear Regulatory Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR §50.92 (c)). A proposed amendment to an operating license for a facility 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 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. Each standard is discussed below for the proposed amendments.

## **Discussion**

- (1) Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The changes being proposed are administrative in nature in that they relocate Technical Specification requirements associated with RETS from the Technical Specifications to the ODCM or PCP. These changes are in accordance with the recommendations contained in GL 89-01, NUREG 1301, and NUREG 1431 Rev. 1. The only change being made to existing requirements or commitments are administrative in nature. The proposed changes do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, nor do they affect any assumptions or conditions in any of the accident analyses. Since the accident analyses remain bounding, their probability or consequences are not adversely affected. Therefore, the probability or consequences of an accident previously evaluated are not affected.

- (2) Operation of the facility in accordance with the proposed amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The changes being proposed are administrative in nature in that they relocate Technical Specification requirements associated with RETS from the Technical Specifications to the ODCM or PCP. These changes are in accordance with the recommendations contained in GL 89-01, NUREG 1301, and NUREG 1431, Rev. 1. The only change being made to existing requirements or commitments are administrative in nature. The proposed changes do not involve any change to the configuration or method of operation of any plant equipment used to mitigate the consequences of an accident.

Therefore, the possibility of a new or different kind of accident from any accident previously evaluated would not be created.

- (3) Operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.

The changes being proposed are administrative in nature in that they relocate Technical Specification requirements associated with RETS from the Technical Specifications to the ODCM or PCP. These changes are in accordance with the recommendations contained in GL 89-01, NUREG 1301, and NUREG 1431, Rev. 1. The only change being made to existing requirements or commitments are administrative in nature. All technical content is preserved. The operating limits and functional capabilities of the affected systems, structures, and components are unchanged by the proposed amendments.

Therefore, a significant reduction in a margin of safety would not be involved.

#### Summary

Based on the above discussion, FPL has determined that the proposed amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (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; and therefore the proposed changes do not involve a significant hazards consideration as defined in 10 CFR §50.92.



ATTACHMENT 3

PROPOSED LICENSE AMENDMENT FOR  
RELOCATION OF RADIOLOGICAL EFFLUENT  
TECHNICAL SPECIFICATIONS

PROPOSED TECHNICAL SPECIFICATION CHANGES

i	3/4 3-57	3/4 11-16	6-18
vi	3/4 3-58	3/4 11-17	Insert 3
x	3/4 3-59	3/4 11-18	6-19
xiii	3/4 3-60	3/4 12-1	6-21
xiv	3/4 3-61	3/4 12-2	Insert 4
xxiv	3/4 11-1	3/4 12-3	6-23
1-3	3/4 11-2	3/4 12-4	Insert 5
1-4	3/4 11-3	3/4 12-5	Insert 6
3/4 3-31	3/4 11-4	3/4 12-6	6-24
3/4 3-37	3/4 11-5	3/4 12-7	
3/4 3-47	3/4 11-6	3/4 12-8	
3/4 3-48	3/4 11-7	3/4 12-9	
3/4 3-49	3/4 11-8	3/4 12-10	
3/4 3-50	3/4 11-9	3/4 12-11	
3/4 3-51	3/4 11-10	3/4 12-12	
3/4 3-52	3/4 11-11	3/4 12-13	
3/4 3-53	3/4 11-12	6-15	
3/4 3-54	3/4 11-13	Insert 1	
3/4 3-55	3/4 11-14	6-17	
3/4 3-56	3/4 11-15	Insert 2	



Table 1 Disposition of Radiological Effluent Technical Specifications		
Specification	Title	Disposition of Existing Specification
1.15	MEMBER(S) OF THE PUBLIC	ODCM Section 1.5.8
1.16	OFFSITE DOSE CALCULATION MANUAL	ODCM Section 1.5.9
1.21	PROCESS CONTROL PROGRAM	0-HPA-045, "Process Control Program" Section 4.3
3.3.3.5	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION	ODCM Control 2.1
4.3.3.5	SURVEILLANCE REQUIREMENTS	ODCM Surveillance Requirements 2.1.1
Table 3.3-7	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION	ODCM Table 2.1-1
Table 3.3-7 ACTIONS 35, 36, AND 37	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION	ODCM Controls 2.1.1, 2.1.2, and 2.1.3 respectively
Table 4.3-5	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS	ODCM Table 2.1-2
3.3.3.6	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION	ODCM Control 3.1
Table 3.3-8	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION	ODCM Table 3.1-1





Table 1  
Disposition of Radiological Effluent Technical Specifications

Specification	Title	Disposition of Existing Specification
Table 3.3-8 ACTIONS 45, 46, 47, AND 48	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION	ODCM Sections 3.1.1, 3.1.2, 3.1.3, and 3.1.4
4.3.3.5	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS	ODCM Control 3.1.1
Table 4.3-6	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS	ODCM Table 3.1-2
3.11.1.1	LIQUID EFFLUENTS CONCENTRATION	ODCM Control 2.2
4.11.1.1.1	LIQUID EFFLUENTS CONCENTRATION SURVEILLANCE REQUIREMENTS	ODCM Section 2.2.1
4.11.1.1.2	LIQUID EFFLUENTS CONCENTRATION SURVEILLANCE REQUIREMENTS	ODCM Section 2.2.2
Table 4.11-1	RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM	ODCM Table 2.2-1
3.11.2.1	RADIOACTIVE EFFLUENTS DOSE	ODCM Control 2.3



Table 1 Disposition of Radiological Effluent Technical Specifications		
Specification	Title	Disposition of Existing Specification
Figure 5.1-1 Figure 5.1-2	UNRESTRICTED AREAS SITE BOUNDARY	Also contained in ODCM Figures 1.5-1 and 1.5-2
4.11.1.2	RADIOACTIVE EFFLUENTS DOSE SURVEILLANCE REQUIREMENTS	ODCM Section 2.3.1
3.11.1.3	LIQUID RADWASTE TREATMENT SYSTEM	ODCM Control 2.4
4.11.1.3.1	LIQUID RADWASTE TREATMENT SYSTEM SURVEILLANCE REQUIREMENTS	ODCM Section 2.4.1
4.11.1.3.2	LIQUID RADWASTE TREATMENT SYSTEM SURVEILLANCE	ODCM Section 2.4.2
3.11.2.1	GASEOUS EFFLUENTS DOSE RATE	ODCM Control 3.2
4.11.2.1.1	GASEOUS EFFLUENTS DOSE RATE SURVEILLANCE REQUIREMENTS	ODCM Section 3.2.1
4.11.2.1.2	GASEOUS EFFLUENTS DOSE RATE SURVEILLANCE REQUIREMENTS	ODCM Section 3.2.2
Table 4.11-2	RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS	ODCM Table 3.2-1
3.11.2.2	RADIOACTIVE EFFLUENTS DOSE- NOBLE GASES	ODCM Control 3.3



Table 1 Disposition of Radiological Effluent Technical Specifications		
Specification	Title	Disposition of Existing Specification
4.11.2.2	RADIOACTIVE EFFLUENTS DOSE- NOBLE GASES SURVEILLANCE REQUIREMENTS	ODCM Section 3.3.1
3.11.2.3	RADIOACTIVE EFFLUENTS DOSE - IODINE-131, IODINE-133, TRITIUM AND RADIOACTIVE MATERIAL IN PARTICULATE FORM	ODCM Control 3.4
4.11.2.3	RADIOACTIVE EFFLUENTS DOSE - IODINE-131, IODINE-133, TRITIUM AND RADIOACTIVE MATERIAL IN PARTICULATE FORM SURVEILLANCE REQUIREMENTS	ODCM Section 3.4.1
3.11.2.4	RADIOACTIVE EFFLUENTS GASEOUS RADWASTE TREATMENT SYSTEM	ODCM Control 3.5
4.11.2.4.1	RADIOACTIVE EFFLUENTS GASEOUS RADWASTE TREATMENT SYSTEM SURVEILLANCE REQUIREMENTS	ODCM Section 3.5.1
4.11.2.4.2	RADIOACTIVE EFFLUENTS GASEOUS RADWASTE TREATMENT SYSTEM SURVEILLANCE REQUIREMENTS	ODCM Section 3.5.1



Table 1 Disposition of Radiological Effluent Technical Specifications		
Specification	Title	Disposition of Existing Specification
3.11.2.5	RADIOACTIVE EFFLUENTS EXPLOSIVE GAS MIXTURE	Relocated to TS 3.7.8
4.11.2.5	RADIOACTIVE EFFLUENTS EXPLOSIVE GAS MIXTURE SURVEILLANCE REQUIREMENTS	Relocate to TS 4.7.8
3.11.2.6	RADIOACTIVE EFFLUENTS GAS DECAY TANKS	Relocate to TS 3.7.9
4.11.2.6	RADIOACTIVE EFFLUENTS GAS DECAY TANKS SURVEILLANCE REQUIREMENTS	Relocate to TS 4.7.9
3.11.3	RADIOACTIVE EFFLUENTS SOLID RADIOACTIVE WASTES	0-HPA-045 Section 5.1
4.11.3.1	RADIOACTIVE EFFLUENTS SOLID RADIOACTIVE WASTES SURVEILLANCE REQUIREMENTS (Dewatering)	0-HPA-045 Section 6.2.4 of Attachment 1
4.11.3.2	RADIOACTIVE EFFLUENTS SOLID RADIOACTIVE WASTES SURVEILLANCE REQUIREMENTS (Solidification)	0-HPA-045 Section 6.2 of Attachment 1



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<p>Table 1 Disposition of Radiological Effluent Technical Specifications</p>		
Specification	Title	Disposition of Existing Specification
4.11.3.2a	RADIOACTIVE EFFLUENTS SOLID RADIOACTIVE WASTES SURVEILLANCE REQUIREMENTS	0-HPA-045 Section 6.2.4(1) of Attachment 1
4.11.3.2b	RADIOACTIVE EFFLUENTS SOLID RADIOACTIVE WASTES SURVEILLANCE REQUIREMENTS	0-HPA-045 Section 6.2.4(2) of Attachment 1
4.11.3.2c	RADIOACTIVE EFFLUENTS SOLID RADIOACTIVE WASTES SURVEILLANCE REQUIREMENTS	0-HPA-045 Section 6.2.4(3) of Attachment 1
3.11.4	RADIOACTIVE EFFLUENT TOTAL DOSE	ODCM Control 4.1
4.11.4.1	RADIOACTIVE EFFLUENT TOTAL DOSE SURVEILLANCE REQUIREMENTS	ODCM Section 4.1.1
4.11.4.2	RADIOACTIVE EFFLUENT TOTAL DOSE SURVEILLANCE REQUIREMENTS	ODCM Section 4.1.2
3.12.1	RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM	ODCM Control 5.1
4.12.1	RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM SURVEILLANCE REQUIREMENTS	ODCM Section 5.1.1

<p>Table 1 Disposition of Radiological Effluent Technical Specifications</p>		
Specification	Title	Disposition of Existing Specification
Table 3.12-1	RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM	ODCM Table 5.1-1
Table 3.12-2	REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES	ODCM Table 5.1-2
Table 4.12-1	DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS LOWER LIMIT OF DETECTION	ODCM Table 5.1-3
3.12.2	RADIOLOGICAL ENVIRONMENTAL MONITORING LAND USE CENSUS	ODCM Control 5.2
4.12.2	RADIOLOGICAL ENVIRONMENTAL MONITORING LAND USE CENSUS SURVEILLANCE REQUIREMENTS	ODCM Section 5.2.1
3.12.3	RADIOLOGICAL ENVIRONMENTAL MONITORING INTERLABORATORY COMPARISON PROGRAM	ODCM Control 5.3
4.12.3	RADIOLOGICAL ENVIRONMENTAL MONITORING INTERLABORATORY COMPARISON PROGRAM SURVEILLANCE REQUIREMENTS	ODCM Control 5.3.1



Table 1 Disposition of Radiological Effluent Technical Specifications		
Specification	Title	Disposition of Existing Specification
6.9.1.3	ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT	ODCM Control 1.4 and revised TS 6.9.1.3
6.9.1.4	ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT	ODCM Control 1.3 and revised TS 6.9.1.4
6.10.2q	RECORD RETENTION FOR ODCM AND PCP CHANGES	Added to TS 6.10.2q
6.13	PROCESS CONTROL PROGRAM	Added definition and GL 89-01 wording
6.14	OFFSITE DOSE CALCULATION MANUAL	Added definition and GL 89-01 wording
6.15	MAJOR CHANGES TO LIQUID, GASEOUS, AND SOLID RADWASTE TREATMENT SYSTEMS	ODCM Control 1.2