

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATION CHANGE REQUEST

92-18

"Annual Effluent Report"

Supporting Information for Changes 2 Pages

Philadelphia Electric Company (PECo), Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS) Unit No. 2 and Unit No. 3, respectively, requests that the Technical Specifications contained in Appendix A to the Operating Licenses be amended. Proposed changes to the Technical Specifications are indicated by vertical bars in the margin of pages 207, 212, 216b-2 and 259. The proposed revised pages for each unit are included in Attachment 2.

Description of Changes

- (1) The Licensee proposes that section 3.8.B.3.g (page 207) be amended to change the phrase "Semi-Annual Radiological Effluent Release Report" to "Annual Radiological Effluent Release Report."
- (2) The Licensee proposes that section 3.8.C.4.e (page 212) be amended to change the phrase "Semi-Annual Radioactive Effluent Release Report" to "Annual Radiological Effluent Release Report."
- (3) The Licensee proposes that Table 4.8.1, note 4 (page 216b-2) be amended to change the phrase "Semi-Annual Effluent Release Report" to "Annual Effluent Report."
- (4) The Licensee proposes section 6.9.2.h.(2) (page 259) be amended to change the title from "Semiannual Radioactive Effluent Release Report" to "Annual Radioactive Effluent Release Report." Further, the licensee proposes that this section be amended to include the following, "Routine radioactive effluent release reports covering the previous 12 months of operation shall be submitted within 60 days after September 30 of each year. The first annual report due after this amendment will present data between Jan. 1 and Sept. 30."

Safety Discussion

The proposed changes (1), (2) and (3) merely eliminate the reference to "Semi" in the respective TS sections. No change to the content of the report is proposed by these change requests; therefore, these changes can be considered administrative changes, being implemented to accommodate the relief afforded by the newly revised 10CFR50.36(a).

The proposed change (4) requests changing the title of the unique reporting requirement to, "Annual Radioactive Effluent Release Report." Further, the change to the date of the report submittal is being requested to ease the administrative burden associated with the report while maintaining a continuous history of effluent releases. No change to the content of the report is included in this change request; therefore, this change can be considered an administrative change.

No Significant Hazards Consideration

The change request proposed in this Application do not constitute a significant hazards consideration in that:

- i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because they do not affect operation, equipment, or a safety related activity and are hence administrative in nature. Thus, these administrative changes cannot affect the probability or consequences of any accident.
- ii) The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated because these changes are purely administrative and do not affect the plant. Therefore, these changes cannot create the possibility of any accident.
- iii) The proposed changes do not involve a significant reduction in a margin of safety because the changes do not affect any safety related activity or equipment. These changes are purely administrative in nature and do not affect the margin of safety.

Environmental Assessment

An environmental impact assessment is not required for the changes proposed by this Application because the changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9).

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes and have concluded that they do not involve an unreviewed safety question and are not a threat to the health and safety of the public.

ATTACHMENT 2

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATION CHANGES

List of Attached Pages

<u>Unit 2</u>	<u>Unit 3</u>
207	207
212	212
216b-2	216b-2
259	259

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

may be used to estimate flow.

- f. If the requirements of 3.8.B.3.a, 3.8.B.3.b, 3.8.B.3.c, 3.8.B.3.d, or 3.8.B.3.e, cannot be met, suspend release of radioactive effluents via this pathway.
- g. With less than the minimum number of radioactive liquid radwaste monitors OPERABLE exert best efforts to return the instruments to OPERABLE status within 30 days and if unsuccessful explain in the next Annual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.

- 4. All liquid effluent releases at and beyond the SITE BOUNDARY shall be processed through one of the Radwaste subsystems or combinations of these subsystems listed below, prior to release*:

- (i) The Waste Collector Filter and Demineralizer
- (ii) The Floor Drain Filter
- (iii) The Fuel Pool Filter Demineralizer
- (iv) The Chemical/Oily Waste Cleanup Subsystem

* Whenever the release(s) would cause the projected dose, when it is averaged over one month to exceed 0.12 mrem to the total body or 0.4 mrem to any organ (combined total from the two reactors at the site).

With liquid waste being discharged without treatment as required above, prepare and submit to the Commission within 21 working days pursuant to Specification 6.9.2, a Special Report which includes the following information:

- a. Explanation of why liquid radwaste was

- 4a. Doses due to liquid effluent release to areas at and beyond the SITE BOUNDARY shall be projected once per month in accordance with the methodology and parameters in the ODCM.

- 4b. The waste collector filter and demineralizer and the Floor Drain Filter shall be demonstrated operable once per quarter, unless utilized to process liquid waste during the previous 13 weeks, by analyzing the liquid processed through the subsystem and determining that it meets the requirements of Specification 3.8.B.1. The fuel pool filter demineralizer and the chemical/oily-waste cleanup subsystem are exempt from this requirement because they are alternate treatment subsystems and/or are used only periodically for batch treatment of liquids which are analyzed prior to being released and are

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LIMITING CONDITIONS FOR OPERATION

continue provided samples are continuously collected with auxiliary sampling equipment for periods on the order of 7 days and analyzed within 48 hours after the end of the sampling period.

- d. One reactor building exhaust vent flow rate monitor and one main stack flow rate monitor shall be operable and set to alarm in accordance with the methodology and parameters in the ODCM. From and after the date that both reactor building exhaust vent flow rate monitors are made or found to be inoperable for any reason, effluent releases via their respective pathway may continue provided the flow rate is estimated at least once per 4 hours.

- e. with less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE exert best efforts to return the instruments to OPERABLE status within 30 days and if unsuccessful explain the next Annual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.

5. Gaseous effluents shall be processed through the appropriate gaseous waste treatment system as described below prior to discharge

SURVEILLANCE REQUIREMENTS

- 5a. Doses due to gaseous effluent releases to areas at and beyond the SITE BOUNDARY shall be projected at least once per

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2. A batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analysis, each batch shall be isolated and thoroughly mixed to assure representative sampling.
3. A composite sample is one in which the quantity of the sample is proportional to the quantity of liquid waste discharged and in which the method of sampling results in a sample representative of the liquids released.
4. The principal gamma emitters for which the minimum detectable level specification will apply are exclusively the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144. This list does not mean that only these nuclides are to be detected and reported. Other peaks which are measurable and identifiable, together with the above nuclides, shall also be identified and reported. Nuclides which are below the sample detectable limit for the analyses should not be reported as being present at the sample detectable limit level. When unusual circumstances result in sample detectable limits higher than required, the reasons shall be documented in the Annual Effluent Report. The values listed are believed to be attainable.
5. Certain mixtures of radionuclides may cause interference in the measurement of individual radionuclides at their detectable limit especially if other radionuclides are at much higher concentrations. Under these circumstances use of known ratios of radionuclides will be appropriate to calculate the levels of such radionuclides.

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environmental monitoring program including sampling methods for each sample type, size and physical characteristics of each sample type, sample preparation methods, and measuring equipment used; at least two maps of all sampling locations keyed to a table giving distances and directions from the midpoint between reactor vents; the results of land use censuses required by Specification 3.8.E.2; the results of the Interlaboratory Comparison Program and discussion of all analyses in which the LLD required by Tables 4.8.1 and 4.8.2 was not achievable.

(2) Annual Radioactive Effluent Release Report

Routine radioactive effluent release reports covering the previous 12 months of operation shall be submitted within 60 days after September 30 of each year. The first annual report due after this amendment will present data between Jan. 1 and Sept. 30.

The Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the site.

The Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

- a. Container volume,
- b. Total curie quantity (specify whether determined by measurement or estimate),
- c. Principal radionuclides (specify whether determined by measurement or estimate),
- d. Source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms), and

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