

ATTACHMENT II
DUKE POWER COMPANY
CATAWBA NUCLEAR STATION
McGUIRE NUCLEAR STATION

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

CATAWBA NUCLEAR STATION

ADMINISTRATIVE CONT...

ANNUAL REPORTS ^{1/}

6.9.1.4 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality, unless otherwise specified.

6.9.1.5 Annual Reports shall include the activities of the unit as described below:

a. Personnel Exposures

Replace with Insert A

~~Reports required on an annual basis shall include a tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions ^{2/}, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions.~~

b. Primary Coolant Specific Activity

Reports required on an annual basis shall include the results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: 1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; 2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; 3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; 4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and 5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT***

6.9.1.6 Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be

^{1/} A single submittal may be made for the station. The submittal should combine those sections that are common to both units.

^{2/} This tabulation supplements the requirements of § 20.407 of 10 CFR Part 20. Delete

***A single submittal may be made for the station.

INSERT A

CATAWBA NUCLEAR STATION

An annual report shall include results of individual monitoring carried out by the licensee for each individual for whom monitoring was required by 20.1502 of 10 CFR Part 20. The licensee shall include additional data for individuals for whom monitoring was provided but not required. The licensee shall use Form NRC 5 or electronic media containing all the information required by Form NRC 5. The licensee shall file the report required by 20.2206(b) of 10 CFR Part 20, covering the preceding year, on or before April 30 of each year.

ADMINISTRATIVE CONTROLS6.16 SECTION 16.11 (RADIOLOGICAL EFFLUENT CONTROLS) OF THE FSAR (Continued)

- 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations or a determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations. 1302
- b. Shall become effective upon review and acceptance by the Station Manager and a qualified individual/organization per the Qualified Reviewer Program.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire Section 16.11 of the FSAR as a part of or concurrent with the Semiannual Radioactive Effluent Release Report for the period of the report in which any changes to Section 16.11 of the FSAR was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented

ADMINISTRATIVE CONTROLS

RECORD RETENTION (Continued)

- h. Records of inservice inspections performed pursuant to these Technical Specifications;
- i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- j. Records of meetings of the NSRB and reports required by Specification 6.5.1.10;
- k. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.8 including the date at which the service life commences and associated installation and maintenance records;
- l. Records of secondary water sampling and water quality; and
- m. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

6.10.3 Records of quality assurance activities required by the Operational Quality Assurance Manual shall be retained for a period of time as recommended by ANSI N.45.2.9-1974.

6.11 RADIATION PROTECTION PROGRAM

6.11 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the ^{20.1601(a)} "control device" or "alarm signal" required by paragraph ~~20.203(e)(2)~~ of 10 CFR Part 20, each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at ~~45 cm (18 in.)~~ ^{30 cm (12 in.)} from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Radiation Protection Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or

ADMINISTRATIVE CONTROLS

HIGH RADIATION AREA (Continued)

- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Radiation Protection Manager in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at ~~45 cm (18 in.)~~ ^{30 cm (12 in.)} from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Licensee-initiated changes to the PCP:

- a. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - 1) Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - 2) A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - 3) Documentation of the fact that the change has been reviewed and found acceptable by the Station Manager or the Chemistry Manager.

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ADMINISTRATIVE CONTROLSRECORD RETENTION (Continued)

- g. Records of training and qualification for current members of the unit staff;
- h. Records of inservice inspections performed pursuant to these Technical Specifications;
- i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- j. Records of meetings of the NSRB and reports required by Specification 6.5.1.12;
- k. Records of the service lives of all snubbers including the date at which the service life commences and associated installation and maintenance records;
- l. Records of secondary water sampling and water quality; and
- m. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- n. Records of reviews performed for changes made to the ODCM and the PCP.

6.10.3 Records of quality assurance activities required by the QA Manual shall be retained for a period of time required by ANSI N45.2.9-1974.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

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6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph ~~20.203(c)(2)~~ ^{20.1601(a)} of 10 CFR 20, each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mrem/hr at ~~45 CM (18 in.)~~ ^{30cm (12in.)} from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mrem/hr provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.

ADMINISTRATIVE CONTROLS

HIGH RADIATION AREA (Continued)

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them; or
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Station Health Physicist in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mrem/hr at ³⁰45 CM ¹²18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Foreman on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual areas accessible to personnel with radiation levels greater than 1000 mrem/hr* that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, that area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Licensee-initiated changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:

* ¹²Measurement made at ¹²18 inches from source of radioactivity.

ADMINISTRATIVE CONTROLSSTARTUP REPORT (Continued)

6.9.1.2 The Startup Report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in License conditions based on other commitments shall be included in this report.

6.9.1.3 Startup Reports shall be submitted within: (1) 90 days following completion of the STARTUP test program, or (2) 90 days following resumption or commencement of commercial POWER OPERATION, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of STARTUP test program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS^{1/}

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McGUIRE NUCLEAR STATION

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