

Attachment 1  
Proposed Changes  
to the  
Farley Unit 1 and Unit 2  
Technical Specifications

Proposed Changed  
Technical Specification Pages

Farley Unit 1

Remove Page

XIX  
1-4  
6-17  
6-23

Insert Page

XIX\*  
1-4\*  
6-17\*  
6-23\*\*

Farley Unit 2

Remove Page

XIX  
1-4  
6-17  
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Insert Page

XIX\*  
1-4\*  
6-17\*  
6-23\*\*

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\* Supersedes proposed changed technical specification page submitted by Southern Nuclear Operating Company letter dated June 23, 1992.

\*\* Supersedes proposed changed technical specification page submitted by Southern Nuclear Operating Company letter dated August 24, 1992.

Unit 1

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## DEFINITIONS

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### LIQUID RADWASTE TREATMENT SYSTEM

1.15 This definition deleted. Refer to the Offsite Dose Calculation Manual.

### MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS

1.16 This definition deleted. Refer to the Offsite Dose Calculation Manual and the Process Control Program.

### OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.17 The OFFSITE DOSE CALCULATION MANUAL shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Technical Specification 6.8.3 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Surveillance and ~~Semiannual~~ Radioactive Effluent Release Reports required by Technical Specifications 6.9.1.6, 6.9.1.7, 6.9.1.8 and 6.9.1.9.

Annual

### OPERABLE - OPERABILITY

1.18 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, a normal and an emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

## ADMINISTRATIVE CONTROLS

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### ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.6 and 6.9.1.7 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before 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 consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50. A single submittal may be made for a multiple unit station.

### ANNUAL

#### SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Annual

6.9.1.8 and 6.9.1.9 The ~~Semiannual~~ Radioactive Effluent Release Report covering the operation of the unit during the previous ~~6 months of operation~~ shall be submitted ~~within 60 days after January 1 and July 1 of each year.~~ The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50. A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

calendar year

before May 1

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3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the ~~Semiannual~~ <sup>Annual</sup> Radioactive Effluent Release Report for the period of the report in which any change to the ODCM 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.

Unit 1

Typed Pages



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## ADMINISTRATIVE CONTROLS

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## ADMINISTRATIVE CONTROLS

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Unit 2

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Annual

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## ADMINISTRATIVE CONTROLS

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ANNUAL

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Annual

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calendar year

before May 1



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Unit 2

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Attachment 2

Safety Assessment

Joseph M. Farley Nuclear Plant Units 1 and 2  
Technical Specification Changes Associated With  
Semiannual Radioactive Effluent Release Report

Safety Assessment

Proposed Change 1

Revise proposed Farley Unit 1 and Unit 2 Technical Specification 1.17 submitted by Southern Nuclear Operating Company Letter dated June 23, 1992, in response to Generic Letter 89-01, in order to change the frequency of submittal of the Semiannual Radioactive Effluent Release Report to an annual basis.

Safety Assessment

Proposed Farley Unit 1 and Unit 2 Technical Specification 1.17 submitted by Southern Nuclear Operating Company letter dated June 23, 1992, revised the definition of the Offsite Dose Calculation Manual in accordance with the requirements of Generic Letter 89-01. Contained in that definition was a reference to the Semiannual Radioactive Effluent Release Report. Therefore, it is proposed that the definition be revised to change the reference to the Annual Radioactive Effluent Release Report in order to implement the new 10 CFR 50.36a reporting requirements.

This proposed change is administrative in nature in order to reduce an unnecessary burden of governmental regulation. This change will in no way will reduce the protection for the public health and safety.

Proposed Change 2

Revise proposed Farley Unit 1 and Unit 2 Technical Specifications 6.9.1.8 and 6.9.1.9 and its index reference, submitted by Southern Nuclear Operating Company Letter dated June 23, 1992, in response to Generic Letter 89-01, in order to change the frequency of submittal of the Semiannual Radioactive Effluent Release Report to an annual basis. Also proposed is a change to the submittal date of the report from within 60 days after January 1 and July 1 of each year, to, prior to May 1 of each year.

Safety Assessment

Proposed Technical Specifications 6.9.1.8 and 6.9.1.9 submitted by Southern Nuclear Operating Company letter dated June 23, 1992, contained the Generic Letter 89-01 requirement for submitting a Semiannual Radioactive Effluent Release Report within 60 days after January 1 and July 1 of each year. In accordance with the requirements of



the new 10 CFR 50.36a, Southern Nuclear Operating Company proposes to change the frequency of submittal of the report to an annual basis thereby becoming the Annual Radioactive Effluent Release Report. The corresponding index reference to the Semiannual Radioactive Effluent Release Report has also been revised.

Although a schedule for submittal of an annual report is not stipulated in the new 10 CFR 50.36a, it is proposed that the schedule be revised such that the report is submitted prior to May 1 of each year. This change would then be consistent with the prior to May 1 reporting requirement for the Annual Radiological Environmental Operating Report which is currently contained in Farley Unit 1 and Unit 2 Technical Specification 6.9.1.6, and proposed Farley Unit 1 and Unit 2 Technical Specifications 6.9.1.6 and 6.9.1.7 submitted in Southern Nuclear Operating Company's response to Generic Letter 89-01 dated June 23, 1992.

Farley Unit 1 and Unit 2 Technical Specifications 6.9.1.8 and 6.9.1.9 also require that the quantity of radioactive solid wastes released be reported in the Semiannual Radioactive Effluent Release Report. However, the reporting requirement associated with solid wastes is not addressed in either the old or new 10 CFR 50.36a. Therefore, to be consistent with the proposed reporting requirements for liquid and gaseous effluents it is proposed that the quantity of solid waste releases also be reported on an annual basis.

These proposed changes are administrative in nature in order to reduce an unnecessary burden of governmental regulation. This change will in no way will reduce the protection for the public health and safety.

#### Proposed Change 3

Revise proposed Farley Unit 1 and Unit 2 Technical Specification 6.14.2 submitted by Southern Nuclear Operating Company Letter dated June 23, 1992, in response to Generic Letter 89-01, and later revised by SNC letter dated August 24, 1992 regarding implementation of the new 10 CFR 20 requirements in order to change the frequency of submittal of the Semiannual Radioactive Effluent Release Report to an annual basis.

#### Safety Assessment

Proposed Farley Unit 1 and Unit 2 Technical Specification 6.14.2 submitted by Southern Nuclear Operating Company letters dated June 23 and August 24, 1992, revised the Administrative Controls Section requirements for the Offsite Dose Calculation Manual in accordance with the requirements of Generic Letter 89-01 and the requirements of the

new 10 CFR 20, respectively. Contained in the proposed technical specification was a reference to the Semiannual Radioactive Effluent Release Report. Therefore, it is again proposed that the Administrative Controls Section requirements be revised to change the reference to the Annual Radioactive Effluent Release Report in order to implement the new 10 CFR 50.36a reporting requirements.

This proposed change is administrative in nature in order to reduce an unnecessary burden of governmental regulation. This change will in no way will reduce the protection for the public health and safety.

Attachment 3

Significant Hazards Evaluation

Pursuant to 10 CFR 50.92

Joseph M. Farley Nuclear Plant Units 1 and 2  
Technical Specification Changes Associated With  
Semiannual Radioactive Effluent Release Report

10 CFR 50.92 Evaluation

Proposed Changes

The proposed changes to the Farley Unit 1 and 2 Technical Specifications are required to implement the new 10 CFR 50.36a reporting requirement related to the quantity of radioactive effluents released from nuclear power reactors. Currently, such reporting for Farley is made on a semiannual basis in the Semiannual Radioactive Effluent Release Report. The new 10 CFR 50.36a extends the reporting cycle to an annual basis.

Background

On August 31, 1992, the Nuclear Regulatory Commission (NRC) placed a notice in the Federal Register (57 FR 39353) regarding several amendments to their regulations. Specifically, 10 CFR 50.36a was one of the regulations revised whereby the frequency of reporting the quantity of each of the principal radionuclides released to unrestricted areas in liquid and in gaseous effluents was changed from semiannual to annual. Such action was taken by the NRC in response to a Presidential memorandum requesting that selected Federal agencies review and modify regulations that would eliminate any unnecessary burden of governmental regulation and insure that the regulated community is not subject to duplicative or inconsistent regulation.

The reporting of the quantity of effluent releases is currently performed at Farley on a semiannual basis in accordance with the Semiannual Radioactive Effluent Release Report requirement contained in the Farley Unit 1 and Unit 2 Technical Specifications. That reporting requirement continued to be maintained in Southern Nuclear Operating Company's (SNC's) response to Generic Letter 89-01 dated June 23, 1992 and in SNC's submittal dated August 24, 1992 regarding implementation of the new 10 CFR 20 requirements. Therefore, in accordance with 57 FR 39353, SNC proposes to satisfy the new 10 CFR 50.36a reporting requirement in an Annual Radioactive Effluent Release Report which will replace the current semiannual report.

The Farley Unit 1 and Unit 2 Technical Specifications also require that the quantity of radioactive solid wastes released be reported in the Semiannual Radioactive Effluent Release Report. Although the reporting requirement associated with solid wastes is not addressed in either the old or new 10 CFR 50.36a, SNC believes that the intent of the Presidential memorandum would be to allow for a change to the reporting requirement for solid wastes, similar to that being provided for liquid and gaseous effluents in order to more effectively reduce the burden of governmental regulation.

### Analysis

The proposed changes to the technical specifications will allow for the implementation of the new 10 CFR 50.36a reporting requirement and fulfill the spirit of the Presidential memorandum. The proposed changes are administrative in nature and will not reduce the level of radiological control at Farley. Compliance with applicable regulatory requirements governing radioactive effluents, radiological environmental monitoring, and solid wastes, including 10 CFR 20, Appendix I to 10 CFR 50, 10 CFR 61, 10 CFR 71, and 40 CFR 190, will continue to be maintained.

SNC has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed changes and has made the following determination:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes are administrative in nature and 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. Also, the proposed changes do not alter the conditions or assumptions in any of the Final Safety Analysis Report (FSAR) accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes. Therefore, it can be concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.
2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes are administrative in nature and 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. Accordingly, no new failure modes have been defined for any plant system or component important to safety nor has any new limiting failure been identified as a result of the proposed changes. Also, there will be no change in the types or increase in the amount of effluents released offsite. Therefore, it can be concluded that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed changes do not involve a significant reduction in a margin of safety. The proposed changes are administrative in nature and do not adversely impact the plant's ability to meet applicable regulatory requirements related to liquid and gaseous effluents, and solid waste releases. The proposed changes would also

eliminate an unnecessary burden of governmental regulation without reducing protection for public health and safety. Therefore, it can be concluded that the proposed changes do not involve a significant reduction in a margin of safety.

#### Conclusion

Based on the preceding analysis, SNC has determined that the proposed changes to the technical specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Therefore, SNC has determined that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.

Attachment 4

Environmental Evaluation

Joseph M. Farley Nuclear Plant Units 1 and 2  
Technical Specification Changes Associated With  
Semiannual Radioactive Effluent Release Report

Environmental Evaluation

Southern Nuclear Operating Company has determined that the proposed changes to the Farley Unit 1 and Unit 2 Technical Specifications are administrative in nature and will facilitate implementation of the new 10 CFR 50.36a requirements and fulfill the spirit of the Presidential memorandum. The proposed changes do not adversely affect plant safety since the probability of any accident is not affected nor is there any effect on the consequences of any accident. No changes are being made in the types or amounts of any radiological or non radiological effluents that may be released offsite. The proposed changes do not involve any other environmental impacts. No increase in individual or cumulative occupational radiation exposure will result from these proposed changes. Additionally, these changes do not involve the use of any resources not previously considered in the Final Environmental Statement related to the operation of Farley Nuclear Plant. Therefore, it can be concluded that the proposed changes to the technical specifications will not have a significant effect on the quality of the environment.