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ATTACHMENT A

TECHNICAL SPECIFICATIONS

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ATTACHMENT B

DISCUSSION, JUSTIFICATION AND
NO SIGNIFICANT HAZARDS CONSIDERATIONS

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5.0 ADMINISTRATIVE CONTROLS

5.9.3 Special Reports

Special reports shall be submitted to the Regional Administrator of the appropriate NRC Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification where appropriate:

- a. In-service inspection report, reference 3.3.
- b. Tendon surveillance, reference 3.5.
- c. Containment structural tests, reference 3.5.
- d. Special maintenance reports.
- e. Containment leak rate tests, reference 3.5.
- f. DELETED
- g. Materials radiation surveillance specimens reports, reference 3.3.
- h. Fire protection equipment outage, reference 2.19.
- i. Post-accident monitoring instrumentation, reference 2.21
- j. Electrical systems, reference 2.7(2).

5.9.4 Unique Reporting Requirements

a. Annual Radioactive Effluent Release Report

The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted before May 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 50.

b. Annual Radiological Environmental Operating Report

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) Section IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR 50.

5.0 ADMINISTRATIVE CONTROLS

5.11.1 In lieu of the "control device" or "~~alarm signal~~" required by paragraph ~~20.203(e)(2)~~ 20.1601(a) of 10 CFR Part 20, and as an alternative method allowed under § 20.1601(c), each high radiation area (as defined in § ~~20.202(b)(3)~~ 20.1601 of 10 CFR 20) in which the intensity of radiation, as measured in accordance with 10 CFR Part 20, is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by required issuance of a Radiation Work Permit.* 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.
- 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.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Supervisor-Radiation Protection in the Radiation Work Permit.

5.11.2 The requirements of 5.11.1, above, shall also apply to each high radiation area in which the intensity of radiation, as measured in accordance with 10 CFR Part 20, is greater than 1000 mrem/hr but less than 500 rads/hr (~~Very Restricted~~ High Radiation Area). In addition, locked doors shall be provided to prevent unauthorized ~~enter~~ entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Supervisor-Radiation Protection with the following exception:

- a. In lieu of the above, for accessible localized ~~Very Restricted~~ High Radiation ~~a~~Areas located in large areas such as containment, where no lockable enclosure exists in the immediate vicinity of the ~~Very High~~ Radiation area to control access to the ~~Very Restricted~~ High Radiation ~~a~~Area and no such enclosure can be readily constructed, then the ~~Very Restricted~~ High Radiation ~~a~~Area shall be:
 - i. roped off such that an individual at the rope boundary is exposed to 1000 mrem/hr or less;
 - ii conspicuously posted, and
 - iii a flashing light shall be activated as a warning device.

*Radiation Protection personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

5.0 ADMINISTRATIVE CONTROLS

5.16 Radiological Effluents and Environmental Monitoring Programs

The following programs shall be established, implemented, and maintained.

45.16.1 Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for control of radioactive effluents and for maintaining the doses to individuals in unrestricted areas from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the operability of radioactive liquid and gaseous radiation monitoring instrumentation including operability tests and setpoint determination in accordance with the methodology in the ODCM.
- b. Limitations on the concentration of radioactive material, other than dissolved or entrained noble gases, released in liquid effluents to unrestricted areas conforming to 10 CFR ~~Part 20.1001-20.2401~~, Appendix B, Table H2, Column 2. For dissolved or entrained noble gases, the concentration shall be limited to $2.0 \text{ E-04 } \mu\text{Ci/ml}$ total activity.
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR ~~20.106~~ 20.1302 and with the methodology and parameters in the ODCM.
- d. Limitations on the annual and quarterly doses or dose commitment to individuals in unrestricted areas from radioactive materials in liquid effluents released to unrestricted areas conforming to Appendix I to 10 CFR Part 50.
- e. Determination of cumulative doses from radioactive effluents for the current calendar quarter and current calendar year in accordance with the ODCM on a quarterly basis.
- f. Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity in plant effluents.

5.0 ADMINISTRATIVE CONTROLS

5.16 Radiological Effluents and Environmental Monitoring Programs (continued)

- g. Limitations on the concentration resulting from radioactive material released in gaseous effluents to unrestricted areas conforming to 10 CFR Part 20.1001-20.2401, Appendix B, Table H2, Column 1.
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents to unrestricted areas conforming to Appendix I to 10 CFR Part 50.
- i. Limitations on the annual and quarterly doses to an individual beyond the site boundary from Iodine-131, tritium, and all radionuclides in particulate form with half lives greater than 8 days in gaseous effluents released to unrestricted areas conforming to Appendix I to 10 CFR Part 50.
- j. Limitations on the annual dose or dose commitment to an individual beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

5.16.2 Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- a. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM.
- b. A Land Use Census to ensure that changes in the use of areas at and beyond the site boundary are identified and that modifications to the monitoring program are made if required by the results of this census.
- c. Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

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ATTACHMENT B

DISCUSSION, JUSTIFICATION AND NO SIGNIFICANT HAZARDS CONSIDERATIONS

DISCUSSION AND JUSTIFICATION

The Omaha Public Power District (OPPD) proposes to revise the Fort Calhoun Station Unit No. 1 Technical Specifications to reflect the renumbering of the old 10 CFR 20.106 requirements to the new 10 CFR 20.1302, and implement administrative changes.

CHANGES PROPOSED TO IMPLEMENT THE NEW 10 CFR PART 20

Specifications 5.11.1, 5.11.2, 5.16, and 5.17 are being revised to incorporate requirements in order to implement the new 10 CFR Part 20. The changes consist of revising the references to Part 20 subsections to reflect the new Part 20 subsection numbers, and revising the term "Very High Radiation Area" to "Restricted High Radiation Area." "Very High Radiation Area" is a term defined in the new 10 CFR Part 20, therefore the definition in the Technical Specifications is being revised so that it does not conflict with the new 10 CFR Part 20 definition.

ADMINISTRATIVE CHANGES

The definition of the Offsite Dose Calculation Manual is being revised to reflect the change of the Semiannual Radioactive Effluent Report to the Annual Radioactive Effluents Report consistent with Amendment 152.

Specification 2.21, Table 2-10, Item No. 2, and Specification 3.1, Table 3-3, Item No. 3 are being revised to reflect a change in equipment identification numbers. Modification MR-FC-84-155C is replacing the wide range noble gas stack monitors identified as RM-063L/M/H with two channels which will be identified as RM-062 and RM-063. The combination of the two instruments which will be installed provides the same measurement range as the current RM-063L/M/H and meets the same applicable post accident monitoring requirements.

Specification 5.9.4a is being revised to incorporate guidance from the NRC staff concerning submittal of the annual radioactive effluent release report. It is required by 10 CFR 50.36a that the annual report be submitted each year. The proposed revision would further clarify that the report will be submitted before May 1 of each year following the guidance of NRC staff.

Specification 5.11.1.c. is being revised to add the word "This" into the second sentence so that the sentence is grammatically correct and will read "This individual shall be responsible.."

Specification 5.11.2 contains a grammatical error, the word "enter" is being corrected to read "entry." Specification 5.11.2.a.i. is being revised to replace a period with a comma.

The number for Specification 5.16.1 on page 5-22 is incorrectly stated as 5.6.1, and is being corrected.

The references to 10 CFR Parts and sections are being revised for consistency. When reference is made to the entire 10 CFR Part the word "Part" is included (i.e. 10 CFR Part 20). When reference to a particular section is made the word "Part" is not included (i.e. 10 CFR 20.1302)

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION:

The proposed changes do not involve significant hazards considerations because operation of Fort Calhoun Station Unit No. 1 in accordance with these changes would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed renumbering of the old 10 CFR 20.106 requirements to the new 10 CFR 20.1302 does not affect the probability or consequences of an accident previously evaluated. The proposed changes will not change the types or amounts of effluents that will be released, nor will there be an increase in individual or cumulative occupational radiation exposures.

The proposed changes to the submittal requirements of the annual radioactive effluent report do not affect the probability or consequences of an accident previously evaluated. The required submittal is a reporting requirement only. The proposed change will continue to meet the reporting requirement of 10 CFR 50.36a and further clarifies when the report is to be submitted.

The proposed changes to the equipment identification numbers do not affect the probability or consequences of an accident previously evaluated. The changes reflect a modification which will replace three existing radiation monitors with two monitors which will have the same measurement range of detection and meet the post accident requirements of the present monitors.

- (2) Create the possibility of a new or different kind of accident from any previously analyzed.

The proposed renumbering of the old 10 CFR 20.106 requirements to the new 10 CFR 20.1302 will not create the possibility of a new or different kind of accident. The proposed changes will not change the types or amounts of effluents that will be released, nor will there be an increase in individual or cumulative occupational radiation exposures.

The proposed changes to the submittal requirements of the annual radioactive effluent report will not create a new or different kind of accident. The required submittal is a reporting requirement only, and therefore cannot create an accident.

The proposed changes to the equipment identification numbers will not create the possibility of a new or different kind of accident. The function and operation of the radiation monitors which will replace the existing monitors remains the same as the present monitors.

- (3) Involve a significant reduction in a margin of safety.

The proposed renumbering of the old 10 CFR 20.106 requirements to the new 10 CFR 20.1302 will not create the possibility of a new or different kind of accident. The proposed changes will not change the types or amounts of effluents that will be released, nor will there be an increase in individual or cumulative occupational radiation exposures.

The proposed changes to the submittal requirements for the annual radioactive effluent report and equipment identification numbers are administrative and will not involve a reduction in a margin of safety.

Therefore based on the above considerations, it is OPPD's position that this proposed amendment does not involve significant hazards considerations as defined by 10 CFR 50.92 and the proposed changes will not result in a condition which significantly alters the impact of the Station on the environment. Thus, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared.