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Omaha Public Power District  
444 South 16th Street Mall  
Omaha, Nebraska 68102-2247  
402/636-2000

S. Klementowicz  
5-8FR68170

12/23/93

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OFFICE OF THE DIRECTOR  
USNRC

February 4, 1994  
LIC-94-0035

Chief, Rules Review and Directives Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

References: 1. Docket No. 50-285  
2. Proposed Generic Communication - Guidance for Modification of Technical Specifications to Reflect (A) Revisions to 10 CFR 20 and 10 CFR 50.36, (B) Related Current Industry Initiatives and (C) Miscellaneous Related Editorial Clarifications.

Dear Sir:

SUBJECT: Comments from Omaha Public Power District (OPPD) on Proposed Generic Letter

In Reference 2, the NRC solicited comments for a proposed generic letter that would provide guidance, in the form of model technical specifications (TS), for preparing a license amendment request to modify TS in order to reflect changes to 10 CFR 20, "Standards for Protection Against Radiation," and 10 CFR 50.36a, "Technical Specifications on Effluents from Nuclear Power Reactors." These changes became effective on June 20, 1991, and October 1, 1992, respectively.

OPPD has the following comments regarding the proposed generic letter (GL):

1. The GL should specify whether the requirements of 40 CFR 190 or the requirements of 10 CFR 20.1302(b)(2) apply to members of the public within the controlled area (Section 4/4.11).
2. Sections 6.9, "Reporting Requirements Annual Reports," and 5.9.1.2.(a), "Annual Reports," require submitting a report of all deep dose equivalents (DDE) received greater than 100 mrem. However, 10 CFR 20.1502(a)(1) only requires monitoring if exposures are likely to exceed 500 mrem. The reporting requirements should be consistent with the regulatory requirements (i.e., >500 mrem).
3. In Sections 6.11 and 6.11.2, the wording should allow rope barriers to constitute a barricade. Additionally, the wording should allow dose rates to be specified on a radiation work permit (RWP) and/or referenced to more recent radiological surveys. This would preclude continuous revising and rewriting of RWPs.

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U. S. Nuclear Regulatory Commission  
LIC-94-0035  
Page 2

4. Additional wording should be added to Sections 5.7.2.7(g) and 3.11.2.1 to allow use of effluent concentration in addition to dose rate. For example, the wording should state a limit of 5 times the submersion effluent concentration and 10 times all other effluent concentrations, rather than just dose rates.

Please contact me if you have any questions.

Sincerely,

*W. G. Gates*

W. G. Gates  
Vice President

WGG/mah

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