

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

GENERAL PUBLIC UTILITIES SYSTEM

Jersey Central Power & Light Company
Pennsylvania Electric Company
Metropolitan Edison Company

MAILING ADDRESS:

1 Upper Pond Rd.
Parsippany, NJ 07054

TELEPHONE:

(201) 316-7000

October 28, 1994
C301-94-2006
SNEC-94-0030

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen,

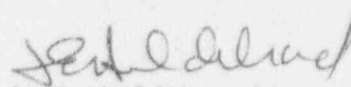
Subject: Saxton Nuclear Experimental Corporation
Operating License No. DPR-4
Docket No. 50-146
Response to the NRC Request for Additional Information
Regarding Technical Specification Change Request No. 55

Enclosed is the SNEC response to the NRC Request for Additional Information regarding Technical Specification (TS) Change Request (TSCR) No. 55. In accordance with 10 CFR 50.4(b)(1), also enclosed is TSCR No. 55 which includes additional text resulting from material provided in response to the questions.

Pursuant to 10 CFR 50.91(a)(1), enclosed is an analysis applying the standards of 10 CFR 50.92 in making a significant hazards considerations determination. Also enclosed is the Certificate of Service for this request certifying service to the chief executives of Liberty Township and Bedford County, Pennsylvania, in which the facility is located, as well as the designated representative of the Commonwealth of Pennsylvania, Bureau of Radiation Protection.

It is requested that the amendment authorizing this TSCR be issued expeditiously and be effective upon issuance to permit facility characterization activities to proceed without delay.

Sincerely,


J. E. Hildebrand
President

WGH

Enclosures: 1) Response to the Request for Additional Information
2) Technical Specification Change Request No. 55
3) Revised Technical Specification Pages
4) Certificate of Service for Technical Specification Change Request No. 55

cc: Administrator, Region I
NRC Project Engineer NRR
NRC Project Engineer, Region I
NRC Project Scientist, Region I

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SAXTON NUCLEAR EXPERIMENTAL CORPORATION

SAXTON NUCLEAR FACILITY

Operating License No. DPR-4
Docket No. 50-146
Technical Specification Change Request No. 55

STATE OF NEW JERSEY)
) SS:
COUNTY OF OCEAN)

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-4 for Saxton Nuclear Facility. As part of this request, proposed replacement pages for Appendix A are also included.

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

BY: *John J. Dulch*
President, SNEC

Sworn and Subscribed to before me
this 23rd day of October 1994.

Diana M. DeBlasio
Notary Public

DIANA M. DEBLASIO
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 6/5/96

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
SAXTON NUCLEAR EXPERIMENTAL FACILITY

LICENSE NO. DPR-4
DOCKET NO. 50-146

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 55 to Appendix A of the Operating License for Saxton Nuclear Facility has, on the date given below, been filed with executives of Liberty Township, Bedford County, Pennsylvania; Bedford County, Pennsylvania; and the Pennsylvania Department of Environmental Resources, Bureau of Radiation Protection, by deposit in the United States mail, addressed as follows:

Mr. Donald Weaver, Chairman
Liberty Township Supervisors
R.D. #1
Saxton, PA 16678

Mr. Richard Rice, Chairman
Bedford County Commissioners
County Courthouse
203 South Juliana Street
Bedford, PA 15522

Mr. William Dornsife
Director, Bureau of Radiation Protection
PA Department of Environmental Resources
Fifth Floor, Fulton Building
Third and Locust Streets
P. O. Box 2063
Harrisburg, PA 17120

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

BY: 
President, SNEC

DATE: 10/28/94

Question 1 *Please describe the steps you will take to prevent the occurrence of a fire in the containment vessel (CV) during characterization activities.*

The condition of the CV was inspected by the TMI Fire Protection Engineer in September 1994. The only item identified of potential fire concern within the CV now and during characterization is transient material (used Anti-Cs currently stored in bags). The Fire Protection Engineer recommended as the amount of combustibles increase, the materials should either be placed in 55 gallon drums to essentially remove the materials as a fuel source or to actually remove the materials from the building. It was also recommended that controls be established and implemented for grinding or hot work activities. A procedure will be developed to control grinding and hot work activities.

In the event of a fire in the CV, what actions will be taken to extinguish the fire?

The fire loading in the CV is very low with a duration of minutes in regard to the ASTM E-119 standard time/temperature curve. The condition will be maintained that way by taking actions such as those described above. Any fire that may be encountered can be effectively fought by personnel at the site using available hand held extinguishers without off-site assistance.

Question 2 *Please provide a summary of all changes made to the technical specification (TS) and the reason for the change*

The following changes were made to the Saxton Nuclear Experimental Corporation Technical Specifications to Facility License DPR-4 as amended by Amendment number 11 dated May 28, 1992:

1. Section A.1. changed by deletion of the words "of land" and inclusion of the acronym "SNEC" for Saxton Nuclear Experimental Corporation. The change was made to improve clarity.
2. Section A.2. Changed the title of the section from "Exclusion Area" to "Exclusion Area Controls". The change was made to improve description of the content of the section.
3. Section A.2.a now contains the a grammatical revision of the original text and references the same figure. The change was made to improve readability of the section.
4. Section A.2.b contains the exclusion area controls previously contained in section B.2.a. The locked areas are now individually listed. The format change improves the clarity and readability of the section.
5. Section A.2.c addresses the Containment Vessel intrusion alarm which was originally contained in section B.2.a. The change relocates the information to a more appropriate section of the TS and improves

readability.

6. Section A.2.d contains the content of section B.2.b and "the" replaced "his" in describing the designated representative. The change relocates the information to a more appropriate section of the TS and improves readability.
7. Section A.3 The first sentence describing the use of the Pennsylvania Electric Company property was simplified. The second sentence was changed to include a third activity "characterization activities associated with the decommissioning of the facility". The change includes characterization activities among those permitted within the Exclusion Area and improves readability.
8. Section B. revised the title from "Administrative and Procedural Safeguards" to "Administrative and Procedural Controls". The change improves the description of the purpose of the section. The following paragraph is new and contains new text describing the organization.
9. Section B.1 revised the title of section B.1 from "Administrative Organization" to "Organization". The change improves the description of the purpose of the section.
10. Section B.1.a contains new text leading to the description of the responsibilities of management and supervisory personnel in the sub-sections that follow. The change improves format and readability of the section.
11. Section B.1.a.1 contains new text describing the responsibilities of the SNEC President. This is an administrative change that adds detail to and improves the clarity of the document.
12. Section B.1.a.2 contains the material originally in the paragraph in section B.1. The responsibility remains the same although the wording has been simplified. The change relocates the information to a more appropriate section of the TS and improves readability.
13. Sections B.1.a.3 through B.1.a.6 are new text sections describing the responsibilities of additional members of the organization. This is an administrative change that adds further details to and improves the clarity of the document.
14. Section B.1.b is a new text section identifying the SNEC Technical Support Project Team interface with SNEC management. The change is administrative and adds new information to the TS.
15. Sections B.1.c through B.1.c.2 are new text sections describing the staffing requirements to be met when the specified activities are in progress. Section B.1.c.1 was revised as a result of the request for additional information to include a parenthetical phrase which provides

the definition of "CV secured." This is an administrative change that adds further details to and improves the clarity of the document.

16. Sections B.1.d through B.1.d.2 are new text sections describing the personnel selection and training requirements to be met by individuals performing permissible activities. This is an administrative change that adds further details to and improves the clarity of the document.
17. Sections B.1.d through B.1.d.2 identify the personnel selection and training requirements for the individuals performing radiological controls, maintenance and characterization activities at the Saxton site. The proposed wording originally contained three sub-sections has been reduced to two. The original d.1 was deleted after review of the result of the request for additional information. It caused confusion which was cleared up by revision of the original d.2 (now d.1). The revision identifies the reference standard and sub-sections to which both the GRCS and Radiological Controls Technicians are qualified. These changes are administrative changes that add further detail to and improve the clarity of the document.
18. Section B.2 is a new section which identifies the review and audit requirements for these activities. The change is administrative and adds further information to the TS.
19. Sections B.2.a and B.2.b and their associated sub-sections are new text sections describing the means via which the review and audit process requirements are satisfied at SNEC. Section B.2.a was revised as a result of the request for additional information and it now identifies a more appropriate means of satisfying the review requirements. Section B.2.b was also revised as a result of the request for additional information on the audit process. The inclusion of these changes is an administrative change that adds further details to and improves the clarity of the document.
20. Section B.3 is a new text sections that addresses procedures and their implementation at SNEC. The sub-sections that follow were originally contained in sections 4.c and 4.d. They were revised as a result of the request for additional information to better identify the activities requiring procedures. These changes in wording and format are administrative changes that add further detail to and improve the clarity of the document.
21. Section B.4 was renamed "Inspections". The wording of section 4.a was revised for readability and the reference to records of inspections was deleted here and moved to Section 5.0 of the TS; Records.
22. The text of section 4.b was broken down to identify the specific activities individually. As a result of the request for additional information 4.a.1 was revised to address "radiation monitoring activities..." versus "Health Physics inspection..." Section 4.a.2 was broken out to identify non-radiological monitoring/inspection activities

performed. The changes in format and the inclusion of additional information improve the readability of the section and are administrative in nature.

23. Section 5 entitled "Records", previously section 3, was introduced between "Inspections" and "Reports". It duplicates the requirements previously delineated. The change in text location improves the readability of the document and is administrative in nature.
24. Section 6, "Reports" contains the unchanged text previously provided in section 5. The change is administrative in nature.
25. Figure 2 depicting the SNEC Organization was added.

Question 3 *Administrative Organization- please explain the difference between solid and dashed lines on Figure 2. If there is a difference, label Figure 2.*

An agreement was entered into between SNEC and GPU Nuclear Corporation (GPUNC) on March 12, 1982 whereby GPUNC provides the necessary maintenance, modifications and dismantlement of the Saxton Nuclear Experimental facility. The President-GPUNC has corporate responsibility for SNEC. The solid lines delineate direct reporting between the entities identified in both the SNEC and GPUN organizations. The dashed line between the SNEC President and President GPUN denotes the indirect (GPUN's contractual commitment to SNEC resulting from the agreement) reporting. A legend identifying the meaning of the different line types has been included on the figure. The figure has also been revised to clarify the reporting chain.

Question 4 *Staffing- what is the definition of CV secured? Please add the definition to the TS.*

The definition of "Containment Vessel Secured", per Saxton Procedure 6575-ADM-4500.24, "Initial Containment Vessel Entry," is when the CV is sealed except for the breather opening. Since there is no definition section in the TS, section B.1.c.1 has been revised by addition of a parenthetical phrase to include the definition. The section now reads:

1. At least two individuals, one of which must be knowledgeable in radiation monitoring and the radiological hazards associated with the facility, shall perform radiological surveys necessary to support planned activities within the Containment Vessel if the Containment has been secured (Containment Vessel is sealed except for the breather opening) for a period greater than 24 hours.

Question 5 Selection and Training of Personnel- Please describe the qualifications that are met to be a Three Mile Island qualified Group Radiological Controls Supervisor (GRCS).

The reference to Three Mile Island (TMI) qualified GRCSs was made to eliminate the need to duplicate the TMI Radiological Controls training and qualification program, documentation and record keeping requirements as a separate Saxton program. Personnel previously trained, qualified and requalified via the GPUNC program commonly support SNEC in Radiological Controls Technician and GRCS positions. Therefore, it is our intent to present the GPUNC program along with the supporting documentation during inspections when questioned on the subject of Radiological Controls Technician and GRCS training and qualification. The requirements of the revised TS sections identified below will be proceduralized.

Based on the information above, the wording of section B.1.d is being revised as follows:

- d. Personnel selection and training requirements are as follows:
 - 1. Each Radiological Controls Technician/GRCS shall meet or exceed the qualifications of ANSI-N 18.1-1971, paragraph 4.5.2 and 4.3.2 respectively or shall be formally qualified through an NRC approved Radiological Controls training program.
 - 2. All personnel conducting maintenance or characterization activities shall be briefed on the SNEC site specific conditions and requirements of the Characterization Plan.

Neither the Saxton Nuclear Facility Radiation Protection Plan nor the TS describe the training for radiation workers. Please describe this training and include it in Saxton facility documentation.

All personnel requiring unescorted entry into areas controlled by a Radiation Work Permit (RWP) shall be trained in Radiological Controls. Training will be based on the following references: ANSI 18.1-1971, Section 5.4, 10 CFR 19, 10 CFR 20, Reg Guides 8.13 and 8.15 and NUREG 0041. This information as well as the Radiological Controls Technician and GRCS training requirements will be incorporated into a SNEC procedure.

Question 6 Review- why does the Saxton General Office Review Board (SGORB) report to the President of GPUNC as opposed to the President of SNEC? What responsibility does the President of GPUNC have for safety at Saxton. Please add these safety responsibilities to the TS.

Your request for additional information dated October 23, 1993 requested information regarding review functions based on ANSI/ANS 15.1, Section 6.2. As a result, the response identified a committee which currently exists and provides an independent safety review function for TMI-1, called the General Office Review Board (GORB). It also provides this function for SNEC through a subcommittee; the SGORB. This GORB reports to the President - GPUNC.

Upon further review of regulatory guidance, it was decided that a Radiation Safety Committee was more applicable to the purpose and shall be established to review activities dealing with SNEC radiological safety matters. A description of the responsibilities of the Radiation Safety Committee is included in the response to the questions that follow.

Who appoints the members to the SGORB? What is the minimum number of SGORB members? What is the minimum meeting frequency for the SGORB, the definition of a quorum, and the requirements for the dissemination, review and approval of SGORB meeting minutes? The above information normally appears in the TS. Please justify and add to the TS the minimum list of items that must be reviewed by the SGORB.

Based on the response to the previous question, the response to these questions addresses the Radiation Safety Committee. The following text will be included in a revised TS section B.2.a as follows:

B.2.a Radiation Safety Committee

1. The Radiation Safety Committee shall report to the SNEC President. The Committee will consist of four members appointed by the SNEC President. Three members shall constitute a quorum. It will be responsible to review all matters with radiological safety implications relative to activities at SNEC. Meetings shall be held at least annually to review and discuss the events of the preceding period.
2. The Committee will review characterization and maintenance actions, special nuclear and radioactive material activities, facility changes, quarterly inspection results, audit and NRC Inspection reports and corrective actions for deficiencies identified.
3. Written minutes of all meetings shall be prepared and distributed to the SNEC President.

Question 7 Audit- Please justify and add to the TS the minimum areas that must undergo audit.

GPUN Audit program controls are delineated in procedure 1110-ADM-7218.01. It requires use of a matrix which delineates the areas covered by audits performed by GPUN. The activities and program requirements to be reviewed during the performance of SNEC audits are identified on the matrix. This matrix is a living document which can be changed to add or delete audit scope requirements so as to ensure comprehensive audits continue to be performed. All activities at Saxton are available for audit, especially those activities performed and documented since the last audit at Saxton. The minimum areas to be included in Saxton audits will be those identified on the matrix and those determined in part by the amount and type of work completed since the last audit.

The SNEC Quality Assurance Program requires the implementation of section 10.1 of revision 6 of the GPUNC Operational Quality Assurance Plan for Three Mile Island Unit 1 and Oyster Creek for audits performed at Saxton. This implementation of section 10.1 is to ensure effective audits are performed. The GPUN Quality Assurance Plan requirements meet 10 CFR 50 Appendix B for Three Mile Island and Oyster Creek. Therefore, the GPUN Quality Assurance Plan audit requirements will also be satisfactory for Saxton.

The text of section B.2.b of the SNEC TS will be augmented to state:

GPUN audits are performed in accordance with the GPUN audit program procedures. The audit procedures identify areas which may be included in the audit scope.

How will audit reports be submitted and deficiencies discovered during audits be reported to SNEC management, including time limitations?

Audit reports are handled in accordance with GPUNC Procedure 1000-ADM-7218.01. The procedure addresses the distribution of audit reports and associated findings and the requirements for providing corrective action responses to the findings. Since Saxton is not specifically identified in the procedure, the text of section B.2.b of the SNEC TS will be augmented to state:

Audit reports shall be forwarded to the President, SNEC within 60 days of completion of the audit.

Does the statement that the audit function is independent of SNEC management mean line management or all SNEC management? If independent of all management, how does SNEC management assure that timely, correct audits are performed?

The audit function at Saxton is independent of SNEC management to ensure that an unbiased independent assessment or oversight of SNEC activities is performed. The President, SNEC may request an increase in audit frequency, the performance of special audits, or propose items for inclusion in audit scope. He may not limit or deny access to information required by an auditor without justification. SNEC management ensures timely audits are performed, by the GPUN auditors maintaining a schedule which documents the audit frequency and scheduled start dates of all audits they perform. Also, as discussed above, the President, SNEC can request an increase in audit frequency if he determines conditions or activities at Saxton warrant additional audits. As required by GPUN audit program controls, an entrance meeting is held prior to the start of each audit. At this meeting, SNEC management will be informed of the scope of the audit. SNEC management ensures correct audits are performed by participating in the audit entrance meeting, reviewing the scope of the audit and requesting additional items based on conditions and activities underway at the time of the audit.

Will people audit areas they are responsible for?

No. The Audit Team Leader for all SNEC audits will be an individual who is certified to ANSI N45.2.23 and the GPUN audit program requirements. This individual has no responsibilities at Saxton other than to perform the audit.

Question 8 Procedures- who reviews and approves new procedures and changes to existing procedures? Please justify and add this information to the TS.

SNEC Procedure 6675-ADM-4500.07 establishes measures for the preparation, review and approval of procedures. The level of review and approval required for a specific procedure or procedure revision is dependent upon the flow chart decision points depicted on Exhibit 1 of the procedure. The direction contained in the procedure provides appropriate controls for the administration of procedures. Since the procedure contains definitions, detailed methodology, responsibilities, references and exhibits, it is proposed that the following text be added as section B.3.D:

B.3.D These procedures and any subsequent revisions shall be prepared, reviewed and approved in accordance with the requirements of the SNEC administrative procedure for procedures prior to their initial use.

Please justify and list in the TS the minimum activity areas that require procedures.

The following statement has been added to the TS:

B.3.B Written procedures shall be established, implemented and maintained for the activities listed below:

1. Characterization and maintenance activities requiring Health Physics controls consistent with 10 CFR Part 20 requirements.
2. Access control, emergency actions, facility inspections and audits. Access control and facility inspection shall also meet specific requirements of the Technical Specifications.
3. Radiological exposure control, survey activities and radwaste shipping and handling.
4. Activities which could impact containment integrity and/or could result in a measurable release to the environment.

Does the work referred to in TS B.3.A.1. conform with the requirements of the Saxton Nuclear Facility Radiation Protection Plan?

Yes. Section B.3.C.3 (contains text previously located in section B.3.A.1) is made definitive by revising the wording as follows:

3. All radiation surveys, tests, counting work, radiation exposure control measures and all other work performed in radiologically controlled areas shall conform with the requirements of the Saxton Nuclear Facility Radiation Protection Plan.

Question 9 *You discuss the movement of shield blocks to obtain sample/survey information.*

The shield blocks over the Storage Well and Primary Compartment are normally installed. They will be removed as necessary to perform characterization activities to support decommissioning planning. The blocks may need to be removed more than once for this work, as dictated by radiological conditions, results of analysis of data obtained during characterization, and if additional data is determined to be desired during the preparation of the decommissioning plan. The shield blocks will be reinstalled as soon as is practicable, considering the work to be done while the blocks are removed and considering the effect removal of the blocks may have on radiological conditions in the CV.

After the information is obtained, will shield blocks be placed back in their original position?

A single block covers the primary compartment and must be returned to that location. The shield blocks over the Storage Well are interchangeable and an individual block need not be reinstalled in its "original" position to provide the required shielding. When the blocks are reinstalled, the shielding configuration will be identical to the current installation although blocks may be interchanged.

Question 10 How will workers be protected against industrial hazards when performing toxic/hazardous material evaluation?

Sampling of materials potentially containing toxic or hazardous materials will be performed under the controls of the GPUN Corporation Safety and Health Manual and implementing procedures. Workers in the plant will be trained and certified to perform this work under the direction of a GPUN Industrial Hygienist. Samples will be analyzed at the site or in a laboratory using personnel and equipment qualified to perform the work, using procedures which contain the necessary requirements to ensure the safety of the personnel performing the analysis.

Question 11 Please provide a current copy of the SNEC Quality Assurance (QA) Program.

SNEC Procedure 6575-QAP-7200.01 provides the means for identifying those activities to which formal controls apply. A copy of the procedure and the GPUN Quality Assurance Plan Revision 6 are included with this response to the request for additional information.

Question 12 TS A.2.b. discusses exclusion area controls. Please propose a surveillance and surveillance interval for the TS to ensure that the exclusion area controls are periodically checked.

The locks on the SNEC site boundary fence gates are checked "locked" daily by the Penelec personnel headquartered on the Pennsylvania Electric Company property when no SNEC activity is in progress. Personnel performing SNEC activities are responsible for those gate checks when assigned to the site. It is a requirement of the SNEC quarterly facility inspection, performed in accordance with procedure 6575-SUR-4523.01, that the site boundary fence and exclusion area gates be verified "locked" and that the condition of the containment exclusion area fence and gates be verified at least on a quarterly interval.

Since there has been no history of attempted intrusion or vandalism at the SNEC CV, it is considered unnecessary to identify the daily gate checks in the TS (although they will continue to be performed). The

surveillance activity performed in quarterly inspection will be addressed in the TS as written in section B.4.a.2 below.

TS A.2.c. discusses the CV intrusion alarm. Who does this alarm alert and what is their response? Please propose, justify, and add to the TS a surveillance requirement for the periodic testing of this alarm to ensure operability.

The alarm alerts employees at a continuously manned Penelec facility. The details of the response to the alarm will be addressed with the NRC verbally for the purpose of withholding it from public disclosure and the potential to compromise the response effort.

The operability of the alarm is verified at least quarterly during the performance of the quarterly facility inspection in accordance with procedure 6575-SUR-4523.01. To clarify the TS concerning actions taken during the quarterly inspection, the following changes have been made to the previously submitted proposed text for section B.4.a:

1. Section B.4.a.1 is revised to read "The radiation monitoring activities shall include:"
2. Added section B.4.a.2 which reads "The inspection activities shall include:
 - a. Verification that the locks at all entrances to the CV exclusion area fence are locked.
 - b. Verification of the operability of the CV intrusion alarm."

Propose and add to the TS record keeping requirements for the above surveillances.

The performance of the surveillance activities described above are currently documented on the Facilities Check List which is completed with each performance of procedure 6575-SUR-4523.01. Requirements for maintaining the documentation associated with the inspection are already addressed in section B.5.a. Therefore, no new text will be proposed for this item.

I. Technical Specification Change Request No. 55

The Saxton Nuclear Experimental Corporation (SNEC) requests that the following revision be made to the SNEC Technical Specifications (TS):

Replace the existing pages in total.

II. Reason for the Change

The existing TS lack sufficient specification to allow expansion of the level of effort at the site beyond the current "routine and emergency inspections and maintenance associated with the possession of the Saxton Reactor Facility."

This Technical Specification Change Request (TSCR) requests NRC approval to allow characterization of the Saxton facility. The change is necessary to allow the collection of radiological data to support best estimates of manpower, equipment and services, radwaste volumes and types, radiation exposure and costs associated with the decommissioning of the facility to be reflected in the decommissioning plan.

Characterization includes prerequisite and concurrent maintenance and/or modification activities necessary to support the radiological data collection. Characterization activities will consist of:

- 1) Direct radiation measurements using conventional survey instruments. Survey activities will be performed in accordance with the guidance in NUREG/CR-5849, "Manual for Conducting Radiological Surveys in Support of License Termination."
- 2) Removal of samples (concrete cores, insulation, paint, smears of removable contamination and scrapings of corrosion film from the inside surfaces of plant systems) for detailed radiological analysis.
- 3) Component disassembly and shield block removal to permit access for the sample/survey activities described above. System component dismantlement and removal from its installed location will not occur beyond that required to permit characterization. In addition to the core bores, permanent changes or modifications to the facility will be limited to those supporting characterization work; providing power for lighting, heat and internal ventilation for personnel and crane operations for shield block removal/ replacement.
- 4) Toxic/hazardous material evaluation will be performed in addition to the radiological characterization. The materials to be evaluated include but are not limited to lead, lead based paints and asbestos.

The change also revises the content and format of the existing TS making them more consistent with the guidelines for applicable sections of ANSI/ANS 15.1. As a result of that effort existing sections were expanded and new sections were included to address staffing, personnel selection and training, and review and audit. Requirements for records and reports previously dispersed throughout various sections have been compiled in their appropriate sections. Editorial revision is intended to increase clarity.

III. Safety Evaluation

Power operation at the SNEC facility was concluded in May 1972 and shortly afterward all systems, components and areas presently requiring characterization were drained and vented. Within the containment vessel (CV), activities have been limited by TS to routine and emergency inspections and maintenance associated with the possession of the Saxton Reactor Facility. Extensive radiological and toxic/hazardous material characterization, as delineated above, is required to provide data indicative of current conditions relative to these concerns. The characterization data will be used for CV decommissioning planning to evaluate appropriate work practices and determine the extent of the contaminated/radioactive waste resulting from decommissioning activities.

Although the activities proposed in this TS revision allow a more diversified work scope than is currently permitted, the condition of the facility will not differ substantially from that which existed for routine activities permitted by current TS sections 4.b., 4.c., and 4.d. Routine quarterly surveillances performed from mid 1975 to the present have identified no evidence of remaining liquids and no change in the radiological condition of the containment vessel and its contents with the exception of natural radiological decay. The characterization activities will not produce any effect which would cause a release of radiological material in excess of 10 CFR 20 limits.

Characterization and supporting activities will be performed in accordance with approved procedures. Implementation of programmatic and procedural controls will effectively limit any disruption to the stable radiological condition of the containment vessel. Based on the knowledge that the activities will not disrupt that stability, it has been concluded that the characterization activities proposed will have no adverse impact on the health and safety of the public.

Changes to the TS resulting from: editorial clarification, the inclusion of the new sections (addressing management and supervisory personnel organization, staffing, personnel selection and training, procedures, review and audit), and the consolidation of requirements for records and reports, clarify intent and are administrative in nature. Similarly updating the references to 10 CFR 20 due to revision of that document in the records section is administrative. As such, these changes do not affect the health and safety of the public.

V. No Significant Hazards Consideration

Accidents evaluated in the 1972 Safety Evaluation as applicable to the Saxton site are fire, flood and radiological hazard. Although there is no fire detection or suppression capability within the CV, the likelihood of fire and its potential to spread is minimal. Significant combustible materials have been removed from the CV and policy dictates that the area inside the exclusion area fence, including the CV will not be utilized for any purpose including storage. Electrical service is secured except during the performance of periodic inspections and the proposed characterization activities.

The potential effects of inundation of the site have been evaluated and found to be minimal. Stress analysis found the CV capable of withstanding extended flood loading above the operating floor without buckling. The CV will also not be made more buoyant during flood conditions while characterization activities are in progress since any weight removed will be insignificant. With the exception of minor soil contamination, all radioactive material is within the CV. Only very limited quantities of that are available for dispersal within the CV. The isotopes which could be released if the vessel were breached by flood waters would be limited to a small amount of contamination not sealed within the Reactor Coolant System. Due to the inherent safety of the site and the surveillance it would receive during a major storm, the potential for the accidental release of byproduct material as a result of flooding is not considered inimical to public health and safety.

Exclusion is the primary safeguard against radiological hazard. Access to areas within the CV is controlled by the locked and alarmed CV personnel access hatch for those areas above the 812.0 foot elevation and the additional locked stairwell grating barrier barring access to areas below elevation 812.0.

SNEC has determined that this TSCR poses no significant hazards as defined in 10 CFR 50.92. Allowing the performance of characterization activities enhances the success of the decommissioning effort by permitting effective evaluation of the radiological condition of the facility.

The administrative changes and inclusion of characterization activities with those already permitted at the facility will not:

1. Result in a significant increase in the probability or consequences of an accident previously evaluated. The activities associated with characterization of the facility will have a minimum impact on the physical condition of the CV as it relates to the risk of fire and has no effect on the risk flooding.

2. In its present condition, the only accidents applicable to the site are those addressed above. The possibility of a new or different type of accident than that previously evaluated in the FSAR will not be created by the implementation of activities permitted by the approval of this TSCR.
3. No margins of safety relevant to the equipment remaining at the facility exist. Activities involved in characterization will not involve a reduction in a margin of safety.

V. Implementation

It is requested that the amendment authorizing this TSCR be issued expeditiously and be effective upon issuance. Completion and submittal of the Decommissioning Plan for SNEC is dependent on data obtained during facility characterization.

A. SITE

1. Location

The Saxton site is a 1.148 acre tract deeded from the Pennsylvania Electric Company to the Saxton Nuclear Experimental Corporation (SNEC). It is located within the property of the Pennsylvania Electric Company near the Borough of Saxton, Pennsylvania, in Liberty Township, Bedford County, Pennsylvania. The Pennsylvania Electric Company property consists of approximately 150 acres along the Raystown Branch of the Juniata River.

2. Exclusion Area Controls

- a. The exclusion area consists of that portion of the Saxton Nuclear Experimental Corporation property enclosed within the fence containing the Containment Vessel. See Figure 1.
- b. Except for authorized entry the following access points shall be maintained locked:
 - 1) the gate to the Exclusion Area fence surrounding the Containment Vessel,
 - 2) the Containment Vessel access door,
 - 3) the grating covering the Auxiliary Compartment stairwell in the Containment Vessel,
 - 4) and the Rod Room door.
- c. The Containment Vessel shall be equipped with an intrusion alarm to supplement the multiple physical barriers to intrusion.
- d. Employees of the Pennsylvania Electric Company's Line Department headquartered on the Penelec property shall report to the SNEC General Manager or the designated representative any observed indication of change in the facility status as shown by smoke, fire, tornado, flood, or attempted break-in and take any immediate action authorized.

3. Principal Activities

Pennsylvania Electric Company personnel associated with electric power transmission and maintaining electric power distribution equipment are headquartered on the Pennsylvania Electric Company property. Activities permitted within the Exclusion Area shall include routine and emergency inspections, maintenance associated with the possession of the Saxton Reactor Facility and characterization activities associated with the decommissioning of the facility.

B. ADMINISTRATIVE AND PROCEDURAL CONTROLS

Administrative controls relate to the organization, activities, procedures, record keeping, reporting and review and audit considered necessary to provide assurance and evidence that activities within the Exclusion Area are managed in a safe manner. Procedure controls are applicable to activities for which it is considered necessary to provide assurance that they are performed in a safe manner.

1. Organization

SNEC has the responsibility for safely maintaining the Containment Vessel and performing the characterization activities in support of its decommissioning. The organizational structure with reporting and communications lines is depicted in Figure 2.

- a. The responsibilities of management and supervisory level personnel are as follows:
 1. SNEC President provides management oversight for all Saxton activities and reports to the SNEC Board of Directors.
 2. SNEC Vice President and General Manager is responsible for administration of all SNEC functions and for assuring that the requirements of License No. DPR-4 and these Technical Specifications are implemented.
 3. SNEC Radiation Safety Officer (RSO) is responsible for the conduct and oversight of all Saxton Radiation Safety Activities through implementation of the SNEC Radiation Protection Plan. All radiological controls personnel shall have stop work authority in matters relating to or impacting radiation safety.
 4. Group Radiological Controls Supervisor (GRCS) directly supervises radiation safety activities. The position reports to the RSO.
 5. The SNEC Site Superintendent reports to the SNEC General Manager and provides on-site management and continuing oversight of production activities.
- b. The SNEC Technical Support Project Team provides SNEC management with technical support and project management capabilities.
- c. Staffing requirements are as follows:
 1. At least two individuals, one of which must be knowledgeable in radiation monitoring and the radiological

hazards associated with the facility, shall perform radiological surveys necessary to support planned activities within the Containment Vessel if the Containment has been secured (Containment Vessel is sealed except for the breather opening) for a period greater than 24 hours.

2. The RSO or a qualified designee shall be present on site whenever entry and/or maintenance or characterization activities within Containment are in progress.
- d. Personnel selection and training requirements are as follows:
 1. Each Radiological Controls Technician/GRCS shall meet or exceed the qualifications of ANSI-N 18.1-1971, paragraph 4.5.2 and 4.3.2 respectively or shall be formally qualified through an NRC approved Radiological Controls training program.
 2. All personnel conducting maintenance or characterization activities shall be briefed on the SNEC site specific conditions and requirements of the Characterization Plan.

2. Review and Audit

a. Radiation Safety Committee

1. The Radiation Safety Committee shall report to the SNEC President. The Committee will consist of four members appointed by the SNEC President. Three members shall constitute a quorum. It will be responsible to review all matters with radiological safety implications relative to activities at SNEC. Meetings shall be held at least annually to review and discuss the events of the preceeding period.
2. The Committee will review characterization and maintenance actions, special nuclear and radioactive material activities, facility changes, quarterly inspection results, audit and NRC Inspection reports and corrective actions for deficiencies identified.
3. Written minutes of all meetings shall be prepared and distributed to the SNEC President.

- b. The audit function is provided by GPUNC and is independent of SNEC management. Audits shall be performed by qualified individuals, as a minimum, for those activities designated within the scope of the SNEC QA Program. Audits are generally conducted biennially, however, frequency is based on the level

of activity at the Saxton site. Audits may also be performed at the request of the SNEC President. GPUN audits are performed in accordance with the GPUN audit program procedures. The audit procedures identify areas which may be included in the audit scope. Audit reports shall be forwarded to the President, SNEC within 60 days of completion of the audit.

3. Procedures

- A. Activities which are designated as within the scope of the SNEC QA Program shall be prescribed by written, reviewed and approved procedures of a type appropriate to the circumstances. The SNEC procedure control methodology will be prescribed by an administrative procedure.
- B. Written procedures shall be established, implemented and maintained for the activities listed below:
 - 1. Characterization and maintenance activities requiring Health Physics controls consistent with 10 CFR Part 20 requirements.
 - 2. Access control, emergency actions, facility inspections and audits.
 - 3. Radiological exposure control, survey activities and radwaste shipping and handling.
 - 4. Activities which could impact containment integrity and/or could result in a measurable release to the environment.
- C. These procedures shall require that the following actions be taken:
 - 1. All maintenance and characterization work associated with the Containment Vessel under Health Physics control shall be consistent with 10 CFR Part 20 requirements to minimize the radiation exposure of personnel and to prevent the release of radioactivity to the environment.
 - 2. Entry into the controlled area of the containment requires that radiation levels and airborne activity surveys be obtained prior to beginning work.
 - 3. All radiation surveys, tests, counting work, radiation exposure control measures and all other work performed in radiologically controlled areas shall conform with the requirements of the Saxton Nuclear Facility Radiation Protection Plan.

4. Facility inspections and access controls shall meet specific requirements of the Technical Specifications.

D. These procedures and any subsequent revisions shall be prepared, reviewed and approved in accordance with the requirements of the SNEC administrative procedure for procedures prior to their initial use.

4. Inspections

a. Facility inspections shall be performed in accordance with an established schedule at a frequency no less than quarterly. The inspections will be performed by personnel knowledgeable in radiation monitoring and the radiological hazards associated with the facility. Inspection and radiation monitoring activities will be conducted concurrently.

1. The radiation monitoring activities shall include:

- a. Survey of radiation levels and surface contamination in the Containment Vessel.
- b. Replacement of the ventilation "breather" pipe filter and counting the original for activity as a measure of the activity available for release.
- c. Inspection of the Containment Vessel at the lowest level for water. If water is found, a sample shall be taken and analyzed for the isotopic concentration of all significant radionuclides and shall as a minimum include gamma spectral analysis.

2. The inspection activities shall include:

- a. Verification that the locks at all entrances to the CV exclusion area fence are locked.
- b. Verification of the operability of the CV intrusion alarm.

5. Records

In addition to the records required by applicable NRC regulations, including subpart L of 10 CFR 20, 20.2101 through 20.2110 inclusive, SNEC shall retain records of the following:

- a. Inspections of the decommissioned facility including the results of surveys of radioactivity levels and as-found and as-left conditions of the facility.

- b. Entries into the Containment Vessel and the reason for entry.
- c. Dates of quarterly inspections and evaluation of the results.
- d. Radioactivity releases or discharges into the air or water beyond the effective control of SNEC as measured at or prior to the point of such release or discharge.
- e. Design changes and maintenance necessary to maintain the decommissioned facility as described in the Saxton Decommissioning Plan and Safety Analysis Report as revised by SNEC letter dated May 31, 1974 and design changes and maintenance necessary to accomplish characterization activities associated with decommissioning.
- f. Characterization study results.
- g. Audit reports.

6. Reports

In addition to those reports required by applicable NRC regulations (ie. violation of license or technical specification condition) SNEC shall submit the following:

- a. A report of any occurrence of a possible unsafe condition relating to the facility or to the public. For each occurrence, SNEC shall promptly, within 24 hours of discovery, notify by telephone or telegraph, the Administrator of Region I, or designee, and the NRC Operations Center, and shall submit a written follow-up report to the Document Control Desk and the Administrator of Region I within 15 days, which describes the circumstances and the corrective action taken. These reports shall include:
 - 1) Any unplanned or uncontrolled release of radioactive material from the facility.
 - 2) Conditions arising from natural or man-made events that affect the integrity of the Containment Vessel.
- b. An annual report shall be submitted to the Document Control Desk and the Administrator of Region I, within 6 months after the end of the calendar year, of the status of the deactivated facility including:
 - 1) Information relating to changes in those management and supervisory positions designated in section B.1.a as being responsible for the deactivated facility.

- 2) A summary of entries into the Containment Vessel and reasons for entry.
- 3) A summary of maintenance and design changes made to the deactivated facility.
- 4) Results of surveys of radioactivity levels and of water sample analyses.
- 5) A review of the performance of access control and surveillance measures.

Figure 1
Saxton Nuclear Facility Layout

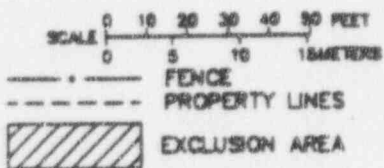
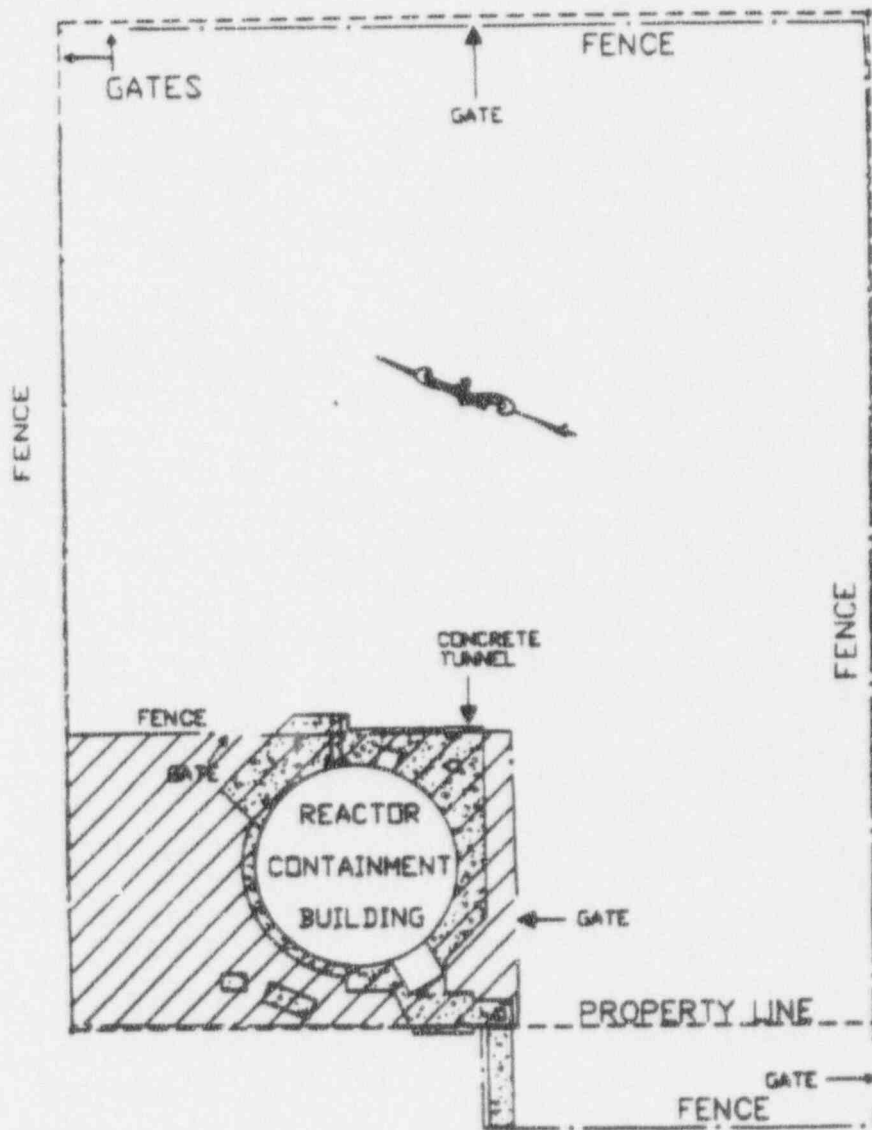


Figure 2

Saxton Nuclear Experimental Corporation (SNEC) Organization

