

15.6.5.2.7 (Continued)

- h) Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i) Reports and meeting minutes of the Manager's Supervisory Staff.

AUDITS

15.6.5.2.8 Audits of facility activities shall be performed under the cognizance of the OSRC. These audits shall encompass:

- a) The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions ~~at least once per year.~~
- b) The performance, training and qualifications of the licensed operating staff ~~at least once per year.~~
- c) The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety ~~at least twice per year at approximately six month intervals.~~
- d) The results of ~~quarterly~~ audits by the ~~Quality Assurance Division~~ quality assurance organization on the performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50, ~~at least once per two years.~~
- e) Any other area of facility operation considered appropriate by the President.

AUTHORITY

15.6.5.2.9 The OSRC shall report to and advise the President on those areas of responsibility specified in Section 15.6.5.2.7 and 15.6.5.2.8.

15.6.5.3 Fire Protection Audits

- a) An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite license personnel or an outside fire protection firm.
- ~~b) An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant, at intervals no greater than 3 years.~~

~~15.6.5.4 Emergency Plan Reviews~~

- ~~a) A review of the Emergency Preparedness Program shall be performed annually utilizing either offsite licensee personnel or an outside nuclear consulting firm. The audit shall be conducted in accordance with 10 CFR 50.54(t) as effective on September 1, 1982.~~

degassed (other than normal gas stripping of the letdown flow). If the monitoring system is out of service for greater than 14 days, in addition to the above sampling, a report of the cause and corrective action for failure and repair of the gas monitor shall be included in the ~~Annual~~ ~~Semiannual~~ Monitoring Report.

Note 8: If the number of channels operable is fewer than the minimum required, effluent releases via this pathway may continue provided grab samples are collected twice per week and analyzed in accordance with Table 15.7.6-1.

Note 9: If the number of channels operable is fewer than the minimum required, effluent releases via this pathway may continue provided the flow is estimated or determined with auxiliary indication at least once every 24 hours.

NOTES FOR TABLE 15.7.6-1

1. The principal gamma emitter for which the gamma isotopic LLD applies is Cs-137. Because gamma isotopic analyses are performed, the LLDs for all other gamma emitters are inherently determined by the operating characteristics of the counting system. All identifiable gamma emitters will be reported in the ~~Annual~~ Semiannual Monitoring Report.
2. A batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses each batch shall be isolated and mixed to assure representative sampling.
3. A continuous release is the discharge of liquid wastes of a non-discrete volume; e.g., from a volume of a system that has an input flow during the release.
4. A continuous composite is one in which the method of sampling employed results in a specimen that is representative of the liquids released.
5. Identified entrained noble gases shall be reported as gaseous effluents.

NOTES FOR TABLE 15.7.6-2

1. The principal gamma emitters for which the LLD specification applies are Cs-137 in particulates and Xe-133 in gases. Because gamma isotopic analyses are performed, the LLDs for all other gamma emitters are inherently determined by the operating characteristics of the counting system. All identifiable gamma emitters will be reported in the ~~Annual~~ Semi-annual Monitoring Report.
2. Tritium grab samples will be taken every 24 hours when the refueling cavity is flooded.
3. The ratio of the sample flow rate to the release flow rate shall be known or estimated for the time period covered by each sampling interval.
4. Tritium grab samples will be taken every seven days from the drumming area ventilation exhaust/spent fuel pool area whenever there is spent fuel in the spent fuel pool.

15.7.7 OPERATIONAL ENVIRONMENTAL MONITORING PROGRAM

Applicability

This section applies to operational environmental radioactivity monitoring and sampling.

Objective

To verify that plant operations have no significant radiological effects on the environment.

Specifications

A. Environmental Monitoring Program

1. Environmental monitoring samples shall be taken at locations specified in the PBNP Environmental Manual according to the sampling and collection frequencies given in Table 15.7.7-1.
2. Deviations from the required sampling schedule as specified in Table 15.7.7-1, are permitted if hazardous conditions, seasonal unavailability, automatic sampling equipment malfunctions, and other legitimate reasons make the sample unobtainable. If the radiological environmental monitoring program is not being conducted as specified in Table 15.7.7-1, a description of the reasons for not conducting the program and the plans for preventing a recurrence will be submitted with the next ~~Annual~~ Semi-annual Monitoring Report.
3. If milk or vegetation samples become unavailable from one or more of the sample locations specified in the PBNP Environmental Manual, identify locations for obtaining replacement samples and add them to the radiological environmental monitoring program within 30 days. The specific locations from which samples were unavailable may then be deleted from the monitoring program. The cause of the unavailability of samples and replacement samples shall be

identified in the next ~~Annual~~ Semiannual Monitoring Report. Figures and tables in the Environmental Manual are to be revised reflecting the new sample locations.

B. Detection Capabilities

1. Environmental samples shall be analyzed as specified in Table 15.7.7-2.
2. The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs).
3. If circumstances render the stated LLDs in Table 15.7.7-2 unachievable, the contributing factors shall be identified and described in next Semiannual Monitoring Report.

C. Notification Levels

1. If a measured level of radioactivity in any environmental medium exceeds the notification level listed in Table 15.7.7-3, resampling and/or reanalysis for confirmation shall be completed within 30 days of the determination of the anomalous result. If the confirmed measured level of radioactivity remains above the notification level, a written report shall be submitted to the NRC in accordance with Section 15.7.8.4.B within thirty days of the confirmation. This report is not required if the measured level of radioactivity was not the result of plant effluents.
2. If more than one of the radionuclides listed in Table 15.7.7-3 are detected in any environmental medium, a weighted sum calculation shall be performed if the measured concentration of a detected radionuclide is greater than 25% of the notification levels. For those radionuclides with LLDs in excess of 25% of the notification level, a weighted sum calculation need only be performed if the reported value exceeds the LLD. The weighted sum is calculated as follows:

$$\frac{\text{concentration (1)}}{\text{notification level (1)}} + \frac{\text{concentration (2)}}{\text{notification level (2)}} + \dots = \text{weighted sum}$$

If the calculated weighted sum is equal to or greater than 1, resampling and/or reanalysis for confirmation shall be completed within 30 days of the determination of the anomalous result. If

the confirmed calculated weighted sum remains equal to or greater than 1, a written report shall be submitted to the NRC in accordance with Section 15.7.8.4.B within thirty (30) days of the confirmation. This calculation requirement and report is not required if the measured level of radioactivity was not the result of plant effluents.

3. All detected radionuclides shall be reported in the Annual Semiannual Monitoring Reports. Naturally occurring nuclides such as Be-7, K-40, and the U-238 and Th-232 decay series radionuclides shall not be included in this requirement.

D. Land Use Census

1. The milk sampling program shall be reviewed annually, including a visual verification of animals grazing in the vicinity of the site boundary, to ensure that sampling locations remain as conservative as practicable.

E. Interlaboratory Comparison Program

1. The environmental sampling analyses shall be performed by a laboratory participating in an Interlaboratory Comparison Program.
2. If the analytical laboratory is not participating in the Interlaboratory Comparison Program, a description of the corrective actions to be taken to preclude a recurrence shall be submitted in the Annual Semiannual Monitoring Report.

Basis

The operational radiological environmental monitoring program as outlined in Table 15.7.7-1 provides sufficient sample types and locations to detect and to evaluate changes in environmental radioactivity. Although radioactivity in plant effluents is continuously monitored and releases are well below levels which are considered safe upper limits, radiological environmental monitoring is a conservative measure undertaken to determine whether the operation of the Point Beach Nuclear Plant produces any significant radiological change in the surrounding environment.

Radioactivity is released in liquid and gaseous effluents. Air particulate samples and thermoluminescent dosimeters placed at various locations provide means of detecting changes in environmental radioactivity as a result of plant releases to the atmosphere.

15.7.8 ADMINISTRATIVE CONTROLS

15.7.8.1 Duties of the Manager's Supervisory Staff

The duties of the Manager's Supervisory Staff with respect to these radiological effluent technical specifications are listed in Specification 15.6.5.1.6 at Items j. and k.

15.7.8.2 Audits

- A. An audit of the activities encompassed by the Offsite Dose Calculation Manual and the Process Control Program and its implementing procedures shall be performed ~~at least once every 24 months~~ utilizing either offsite licensee personnel or a consulting firm.
- B. An audit of the radiological environmental monitoring program and the results thereof shall be performed ~~at least once every 12 months~~ utilizing either offsite licensee personnel or a qualified consulting firm.
- ~~C. The results of the audits in A and B above shall be transmitted to the Vice President Nuclear Power and the Chairman of the Offsite Review Committee.~~

15.7.8.3 Plant Operating Procedures

The ODCM and the PCP shall be established and maintained in accordance with the provisions of specification 15.6.8. Effluent and environmental monitoring shall be addressed in the Quality Assurance Program.

15.7.8.4 RETS Reporting Requirements

The following written reports shall be submitted to the Administrator, U.S. Nuclear Regulatory Commission Region III with a copy to the Director, Office of Inspection and Enforcement, USNRC, Washington, D.C. 20555 within the time periods specified.

A. Annual Semiannual Monitoring Report

A report covering the operation of PBNP for the previous twelve (12) month period, or fraction thereof, ending on December 31, shall be submitted by May 1 ^{of} each year within 60 days after January 1 and July 1 each ye ~~for the six month period or fraction thereof, ending June 30 and December 31~~ containing: