

## TECHNICAL SPECIFICATION CHANGE REQUEST NO. 106, REVISION 1

### HIGH RADIATION AREA

Replace page 6-20 of Appendix A with the attached corresponding revised page.

### PROPOSED CHANGES

On page 6-20, insert the following provision in T.S.6.12.1(b):

"For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem\*\* that are located within large areas, such as the Reactor Building, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual area, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device."

\*\*Measurement made at 18" from source of radioactivity.

### REASONS FOR PROPOSED CHANGES

Under the present requirements Florida Power Corporation must:

- a) Lock the high radiation area, or
- b) Fabricate a lockable enclosure around the high radiation area and lock it, or
- c) Place the high radiation area under direct surveillance as allowed by 10CFR20.203 (c)(4).

In areas such as the containment or the Fuel Handling Area, several areas have dose rates exceeding 1,000 mrem/hr. It is not practical in these areas to provide the required measures during refuel outages. Requirement (a) would cause frequent unlocking of the containment to allow personnel access. Requirement (b) would entail expending unnecessary time and materials to fabricate a temporary enclosure. Finally, requirement (c) requires additional personnel be posted in a radiation area, thus unnecessarily increasing personnel radiation exposure. The requested inclusion of Technical Specification 6.12.1.6 will save a considerable amount of time, materials and exposure.

### SAFETY ANALYSIS

The alternative measure described above will provide equally adequate personnel access control to localized high radiation areas exceeding 1,000 mrem/hr. Currently, each person entering a radiation area must also be authorized by a Radiation Work Permit. This requirement will not change. The provisions proposed, will conspicuously mark the areas which have a significantly higher dose rate. These measures provide a high degree of assurance that these areas will not be entered inadvertently by unauthorized personnel. A similar change has been granted for Joseph M. Farley Nuclear Plant, Unit No. 1 (Amendment No. 17, December 10, 1980) and Fort Calhoun Station, Unit No. 1 (Amendment No. 61, August 20, 1981). In addition, these measures are permissible in the sense that 10 CFR 20.203 (c)(2)(ii) suggests "a conspicuous visible or audible alarm signal" at each entrance to a high radiation area.

As stated in the Specification, 6.12.1.c will be applied only in those areas where no lockable enclosure exists or can be readily constructed. Florida Power Corporation does not intend to totally eliminate the practice of locking High Radiation Areas.

## ADMINISTRATIVE CONTROLS

For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem\*\* that are located within large areas, such as the Reactor Building, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual area, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device.

### 6.13 ENVIRONMENTAL QUALIFICATION

- 6.13.1 By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical in Operating Reactors" (DDR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment", December 1979. Copies of these documents are attached to Order for Modification of License DPR-72 dated October 24, 1980.
- 6.13.2 By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

\*\*Measurement made at 18" from source of radioactivity.