

Docket Number 50-346
License Number NPF-3
Serial Number 1815
Enclosure
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APPLICATION FOR AMENDMENT

TO

FACILITY OPERATING LICENSE NUMBER NPF-3

DAVIS-BESSE NUCLEAR POWER STATION

UNIT NUMBER 1

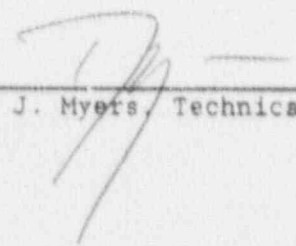
Attached is a requested change to the Davis-Besse Nuclear Power Station, Unit Number 1 Facility Operating License Number NPF-3 Appendix A, Technical Specifications. Also included are the Safety Assessment and Significant Hazards Consideration and a copy of the Offsite Dose Calculation Manual which has been revised to reflect the requested change.

The proposed change (submitted under cover letter Serial Number 1815) concerns:

Relocation of Radiological Effluent Technical Specifications to the Offsite Dose Calculation Manual and Process Control Program.

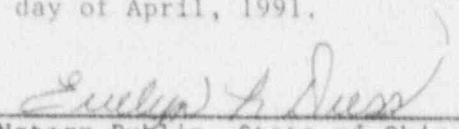
For: D. C. Shelton, Vice President Nuclear

By:


T. J. Myers, Technical Services

Director

Sworn and subscribed before me this 12th day of April, 1991.


Notary Public, State of Ohio

EVELYN L. DRESS
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires July 28, 1994

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The following information is provided to support issuance of the requested change to the Davis-Besse Nuclear Power Station, Unit Number 1 Operating License, Number NPF-3, Appendix A, Technical Specifications.

- A. Time required to implement: This change is to be implemented within 45 days following issuance of the amendment by the NRC.
- B. Reason for change (License Amendment Request Number 90-0023): NRC Generic Letter 89-001 dated January 31, 1989, recommends relocation of the procedural details included in the current Radiological Effluent Technical Specifications (RETS) to the Offsite Dose Calculation Manual and Process Control Program. Future changes to the relocated RETS requirements will be made by the licensee in accordance with the proposed administrative controls without prior NRC approval.
- C. Safety Assessment and Significant Hazards Consideration: See Attachment 1.
- D. Revised Offsite Dose Calculation Manual: A copy of the revised Offsite Dose Calculation Manual reflecting the relocation of RETS procedural details from Technical Specifications is attached for information, as requested by Generic Letter 89-001. (Attachment 2).

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SAFETY ASSESSMENT AND
SIGNIFICANT HAZARDS CONSIDERATION FOR
LICENSE AMENDMENT REQUEST 90-0023

TITLE:

Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (RETS) and Relocation of RETS Procedural Details to the Offsite Dose Calculation Manual (ODCM) and Process Control Program (PCP)

DESCRIPTION:

The proposed change would revise the Davis-Besse Nuclear Power Station (DBNPS) Unit 1, Operating License NPF-3, Appendix A, Technical Specifications (TS) to relocate the procedural details of the current RETS to the Offsite Dose Calculation Manual (ODCM) and Process Control Program (PCP). New programmatic controls are added to the TS Section 6.0, Administrative Controls, to satisfy existing regulatory requirements for RETS.

The proposed change is consistent with the guidance provided by the Nuclear Regulatory Commission's January 31, 1989 Generic Letter 89-01, Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program (Log Number 2824). Table 1 summarizes the disposition of RETS requirements affected by this change. Copies of the affected TS sections marked up to illustrate the changes are attached.

NRC Generic Letter 89-01 provides the basis for relocation of RETS requirements to the ODCM and PCP. Relocation of the procedural details of the current RETS is a line item improvement resulting from the Commission's Policy statement for the Technical Specifications Improvement Program (TSIP). As part of Technical Specifications Improvement Program, the NRC defined criteria to be used in determining which requirements merit inclusion in Technical Specifications. The RETS, in general, do not satisfy the criteria for inclusion in Technical Specifications. However, 10 CFR 50.36a requires Technical Specifications for radioactive effluents from nuclear power reactors. The programmatic controls on effluents being added to Section 6.0, Administrative Controls, in accordance with Generic Letter 89-01 have been determined by the NRC to satisfy 10 CFR 50.36a, 10 CFR 20.106, 40 CFR Part 190 and Appendix I to 10 CFR Part 50.

SYSTEMS, COMPONENTS AND ACTIVITIES AFFECTED:

The proposed change involves radioactive liquid, radioactive gaseous and solid radwaste treatment systems, radioactive liquid and gaseous effluent monitoring instrumentation, administrative controls on releases of radioactive waste from the plant, and monitoring of the impact of releases of radioactive material on the environment. No hardware changes are involved. The proposed change affects only the relocation of procedural details of RETS and places them in the ODCM and PCP. Changes to the ODCM and PCP will be controlled by the Administrative Controls Section of TS. No changes to existing requirements are made by this proposed license amendment request.

SAFETY FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVITIES:

The function of the radioactive liquid and gaseous radwaste treatment systems are to maintain the doses committed to individuals from offsite releases within regulatory limits, and the releases of radioactive materials in these effluents as low as reasonably achievable (ALARA). Radioactive liquid and gaseous radwaste treatment systems and effluent monitoring instrumentation, sampling and analysis requirements, and the radiological environmental monitoring program, provide the means for controlling, monitoring, quantifying, and assessing the effects of radioactive releases. The solid radwaste treatment systems ensure that solid radwaste is prepared in accordance with regulatory requirements for transportation and disposal at a low level radioactive waste facility. The function of the RETS procedural details are to control the performance of these activities.

EFFECTS ON SAFETY:

The principle effect of this change is on the degree of regulatory control for future changes to current RETS requirements. Currently, even minor changes to existing RETS requirements included in Technical Specifications require prior NRC review, approval, and issuance of a license amendment. This amendment request will transfer procedural details of the current RETS for radioactive liquids and gaseous effluents, and the environmental monitoring program to the ODCM and will transfer procedural details for solid radioactive waste requirements to the PCP. General programmatic requirements for radioactive liquid and gaseous effluents, and the radiological environmental monitoring program are being added to TS 6.8.4, Procedures and Programs, as 6.8.4.d, "Radioactive Effluent Controls Program", and 6.8.4.e, "Radiological Environmental Monitoring Program".

Future changes to the PCP and ODCM, including the relocated RETS requirements, will be made in accordance with TS 6.14, Process Control Program, and 6.15, Offsite Dose Calculation Manual, respectively. These TS sections require ODCM and PCP changes to be documented with sufficient information to support the change including appropriate analysis or evaluations to justify the changes. In addition, for PCP changes, the documentation shall include a determination that the change will maintain the overall conformance of solidified waste products to existing Federal, State or other applicable regulations. For ODCM changes, the documentation shall include a determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a and 10 CFR 50 Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations. Changes to the PCP and ODCM shall become effective after review and acceptance by the Station Review Board (SRB) and approval of the Plant Manager. ODCM changes will continue to be submitted to the NRC with the Semiannual Radioactive Effluent Release Report for the period during which ODCM changes were made.

Certain existing RETS requirements are retained in Technical Specifications. These include definitions of RETS related terms which continue to be used in Technical Specifications, operability and surveillance requirements for Waste Gas System explosive gas monitoring instrumentation, limits on the quantity of radioactive material which may be contained in certain liquid holdup tanks, limits on oxygen concentration in the Waste Gas System, and programmatic administrative controls governing radiological effluents and environmental monitoring. Editorial changes have been made to the retained requirements to maintain consistency in format and to accommodate sections which have been deleted.

The relocation of existing RETS procedural details to the ODCM and PCP does not alter existing technical requirements. The programmatic controls defining the elements of the Radioactive Effluents Controls Program and the Radiological Environmental Monitoring Program require the licensee to reconcile future changes to the PCP and ODCM with the same regulatory standards that the NRC currently uses as a basis for acceptance of RETS changes. Future hardware modifications or procedure changes which formerly would have involved NRC review of changes to RETS requirements will continue to be evaluated in accordance with 10 CFR 50.59. Consequently, it is determined that the proposed relocation of RETS procedural details does not have a significant impact on safety. There exist adequate TS programmatic controls that govern changes to the PCP and ODCM.

SIGNIFICANT HAZARDS CONSIDERATION:

The Nuclear Regulatory Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed change would: (1) Not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) Not create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Not involve a significant reduction in a margin of safety. Toledo Edison has reviewed the proposed change and determined that the proposed change does not involve a significant hazards consideration because operation of the Davis-Besse Nuclear Power Station, Unit No. 1, in accordance with this change would:

- 1a. Not involve a significant increase in the probability of an accident previously evaluated because the proposed change does not involve any changes to the configuration of the plant, its operation and maintenance, or change any existing requirements governing the amounts or types of radioactive material permitted to be released from the site. The principle effect of the proposed change is to transfer the review of most future changes to RETS requirements from the NRC to the licensee. Existing RETS requirements, which establish initial conditions or prevent previously evaluated accidents are unaffected by this proposed change and remain in Technical Specifications. Technical Specifications for the Waste Gas System oxygen monitor and explosive gas mixture concentration limits are retained. The requirements are intended to prevent a hydrogen explosion from rupturing the waste gas system.

For RETS requirements which are relocated to the ODCM and PCP, changes can be made without prior NRC approval. However, Technical Specifications require the licensee to review such changes against the same regulatory requirements as the NRC would use in reviewing license amendment requests. This limitation on the scope and flexibility of licensee changes to former RETS requirements ensures that any future changes will not significantly affect the probability of any previously analyzed accident. Furthermore, any changes which formerly would have required NRC review and approval of a change to the RETS will continue to be subject to the requirements of 10 CFR 50.59.

- 1b. Not involve a significant increase in the consequences of an accident previously evaluated because the proposed change does not involve any changes to the configuration of the plant or any existing requirements governing the amounts or types of radioactive material permitted to be released from the site. The principle effect of the proposed change is to transfer the review of most future changes to RETS requirements from the NRC to the licensee. Existing restrictions which limit the consequences of postulated accidents are unaffected by this proposed change. Existing requirements limiting the inventory of temporary liquid holdup tank are retained in Technical Specifications. These restrictions on the liquid holdup tank inventory limit the offsite dose consequences from a liquid holdup tank failure. The consequences of this event are unaffected by the proposed change.

Technical Specifications require that future changes to former RETS requirements which are transferred to the ODCM and PCP be reviewed by the licensee against the same regulatory standards as the NRC would use in reviewing license amendment requests. This limitation on the scope and flexibility of licensee changes to former RETS requirements ensures that future changes will not significantly affect the consequences of any previously analyzed accidents. Furthermore, any hardware or procedure changes which formerly would have required NRC review and approval of a change to the RETS will continue to be subject to the requirements of 10 CFR 50.59.

- 2a. Not increase the possibility of a new kind of accident from any accident previously evaluated, because the proposed change does not involve any hardware changes or change any existing requirements for the release of radioactive liquid, gaseous, or solid waste from the site. Future changes to hardware or procedures used to implement former RETS requirements will continue to be subject to the requirements of 10 CFR 50.59. Consequently, any such changes will individually require a finding that the possibility of a new kind of accident from any accident previously evaluated is not created.
- 2b. Not create the possibility of a different kind of accident from any accident previously evaluated because the proposed change does not involve any hardware changes or change any existing requirements for radioactive releases from the plant. Future changes to hardware or procedures which implement former RETS requirements will continue to be subject to the requirements of 10 CFR 50.59.

3. Not involve a significant reduction in a margin of safety because the Technical Specifications will require that future changes to former RETS requirements which are transferred to the ODCM and PCP, be reviewed against the same regulatory standards (for example, 10CFR20.106, 40CFR Part 190, 10CFR50.36a and 10CFR50 Appendix I) as the NRC would use in reviewing license amendment requests. This limitation on the scope of licensee changes to former RETS requirements assures that future changes will not significantly affect a margin of safety.

CONCLUSION:

On the basis of the above, Toledo Edison has determined that the License Amendment Request involves no significant hazards consideration. As this License Amendment Request concerns a proposed change to the Technical Specifications that must be reviewed by the Nuclear Regulatory Commission, this License Amendment Request does not constitute an unreviewed safety question.

Attachment

Attached is a table identifying the disposition of affected Technical Specifications and the proposed marked-up changes to the affected Technical Specifications.

TABLE 1

Disposition of RETS Requirements Affected by LAR 90-0023

<u>SPECIFICATION</u>	<u>TITLE</u>	<u>DISPOSITION</u>
1.29	Source Check	Relocated to ODCM. Term is no longer used in Technical Specifications.
1.30	Process Control Program	Revised consistent with GL 89-01
1.31	Solidification	Relocated to PCP. Term is no longer used in Technical Specifications.
1.32	Offsite Dose Calculation Manual	Revised consistent with GL 89-01
1.33	Gaseous Radwaste Treatment System	Relocated to ODCM. Term is no longer used in Technical Specifications.
1.34	Ventilation Exhaust Treatment System	Relocated to ODCM. Term is no longer used in Technical Specifications.
1.35	Purge-Purging	Relocated to ODCM. Term is no longer used in Technical Specifications.
1.36	Venting	Relocated to ODCM. Term is no longer used in Technical Specifications.
1.40	Dewatering	Relocated to PCP. Term is no longer used in Technical Specifications.
Table 1.2	Frequency Notation	Notation "P" deleted. This frequency is no longer used in Technical Specifications. The frequency notations used in surveillance requirements relocated to the ODCM are defined in the ODCM consistent with the existing Table 1.2.
3/4.3.3.9	Radioactive Liquid Effluent Monitoring Instrumentation	Relocated to the ODCM. Programmatic controls incorporated in TS 6.8.4.d.1.

TABLE 1 (Continued)

Disposition of RETS Requirements Affected by LAR 90-0023

<u>SPECIFICATION</u>	<u>TITLE</u>	<u>DISPOSITION</u>
3/4.3.3.10	Radioactive Gaseous Effluent Monitoring Instrumentation	Renumbered as TS 3/4.3.3.9 and retitled as "Waste Gas System Oxygen Monitor." Existing requirements relating to the waste gas system oxygen monitor used for explosive gas monitoring are retained in TS in accordance with GL 89-01. Other radioactive gaseous effluent monitoring instrumentation requirements are relocated to the ODCM. Programmatic controls governing effluent monitoring instrumentation are incorporated in TS 6.8.4.d.1.
3/4.11.1.1	Liquid Effluents-Concentration	Relocated to the ODCM. Programmatic controls governing concentration and sampling and analysis requirements are incorporated in TS 6.8.4.d.2 and TS 6.8.4 d.3.
3/4.11.1.2	Dose	Relocated to the ODCM. Programmatic controls limits on dose commitments to members of the public in unrestricted areas incorporated in TS 6.8.4.d.4 and TS 6.8.4.d.5. Figure 3.11-1 is relocated to TS Section 5, Design Features, as Figure 5.1-3 referred to by TS 5.1.3. "Site Boundary," consistent with Generic Letter 89-01 guidance.
3/4.11.1.3	Liquid Radwaste Treatment System	Relocated to the ODCM. Programmatic controls governing the operability and use of liquid effluent treatment systems are incorporated in TS 6.8.4.d.6.
3/4.11.1.4	Liquid Holdup Tanks	Existing Specification is retained but renumbered as 3/4.11.1.

TABLE 1 (Continued)

Disposition of RETS Requirements Affected by LAR 90-0023

<u>SPECIFICATION</u>	<u>TITLE</u>	<u>DISPOSITION</u>
3/4.11.2.1	Gaseous Effluents- Dose Rate	Relocated to the ODCM. Programmatic controls governing offsite dose rates are included in TS 6.8.4.d.3 and TS 6.8.4.d.7.
3/4.11.2.2	Gaseous Effluents Dose-Noble Gases	Relocated to the ODCM. Programmatic controls governing noble gas doses are incorporated in TS 6.8.4.d.5 and TS 6.8.4.d.8. Figure 3.11-2 is relocated to T.S. Section 5. Design Features, as Figure 5.1-4, referred to by TS 5.1.3, "Site Boundary" consistent with Generic Letter 89-01 guidance.
3/4.11.2.3	Dose-Iodine-131, Tritium and Radio- nuclides in Particulate Form	Relocated to the ODCM. Programmatic controls are incorporated in TS 6.8.4.d.5 and TS 6.8.4.d.9.
3/4.11.2.4	Gaseous Radwaste Treatment System	Relocated to the ODCM. Programmatic controls governing operability and use of gaseous radwaste treatment systems are included in TS 6.8.4.d.6.
3/4.11.2.5	Explosive Gas Mixture	Retained in Technical Specifications as TS 3/4.11.2 to accommodate relocation of other specifications from Section 3/4.11.
3/4.11.3	Solid Radioactive Waste	Relocated to the PCP. TS 6.14 establishes controls for changes to the PCP.
3/4.11.4	Total Dose	Relocated to the ODCM. Programmatic controls governing annual dose or dose commitment to a member of the public are included in TS 6.8.4.d.10.
3/4.12.1	Radiological Environ- mental Monitoring Program	Relocated to the ODCM. Programmatic controls governing monitoring, sampling, analysis and reporting of radiation and radionuclides in the environment are included in TS 6.8.4.e.1.

TABLE 1 (Continued)

Disposition of RETS Requirements Affected by R 90-0023

<u>SPECIFICATION</u>	<u>TITLE</u>	<u>DISPOSITION</u>
3/4.12.2	Land Use Census	Relocated to the ODCM. Programmatic controls requiring a land use census and appropriate changes to the radiological environmental monitoring program are incorporated in TS 6.8.4.e.2.
3/4.12.3	Interlaboratory Comparison Program	Relocated to the ODCM. Programmatic controls requiring participation in an interlaboratory comparison program are incorporated in TS 6.8.4.e.3.
B3/4.3.3.9	Radioactive Liquid Effluent Monitoring Instrumentation	Deleted.
B3/4.3.3.10	Radioactive Gaseous Effluent Instrumentation	Renumbered as B3/4.3.3.9 and retitled "Waste Gas System Oxygen Monitor." Revised to reflect function of Waste Gas System Oxygen Monitor for which TS requirements are retained.
B3/4.11.1	Liquid Effluents	Only bases for Liquid Holdup Tanks (formerly B3/4.11.1.4) is retained and renumbered as B3/4.11.1. All other Liquid Effluent bases are deleted.
B3/4.11.2	Gaseous Effluents	Only bases for Explosive Gas Mixture (formerly B3/4.11.2.5) is retained and renumbered as B3/4.11.2. All other Gaseous Effluents bases are deleted.
B3/4.11.3	Solid Radioactive Waste	Deleted.
B3/4.11.4	Total Dose	Deleted.
B3/4.12	Radiological Environmental Monitoring	Deleted.
5.1.3	Design Features: Site Boundary	TS 5.1.3 is added to define the unrestricted area and site boundary for radioactive liquid

TABLE 1 (Continued)

Disposition of RETS Requirements Affected by LAR 90-0023

<u>SPECIFICATION</u>	<u>TITLE</u>	<u>DISPOSITION</u>
		effluent and radioactive gaseous effluents as shown on Figure 5.1-3 (formerly Figure 3.11-1) and Figure 5.1-4 (formerly Figure 3.11-2).
6.8.4	Procedures and Programs	New sections 6.8.4.d "Radioactive Effluent Controls Program," and 6.8.4.e, "Radiological Environmental Monitoring Program", are incorporated as recommended by GL 89-01, to establish program elements to be addressed in the ODCM, and to satisfy 10 CFR 50.36a requirements for RETS.
6.9.1.10	Annual Radiological Environmental Operating Report	Requirements are simplified to be consistent with GL 89-01. Reporting details are relocated to the ODCM.
6.9.1.11	Semiannual Radioactive Effluent Release Report	Reporting details are relocated to the ODCM. Retained requirements are simplified to be consistent with GL 89-01.
6.9.2	Special Reports	6.9.2.g through 6.9.2.m are deleted because referenced TS sections are relocated to the ODCM and removed from TS. Requirements for special reports are relocated to the ODCM.
6.10	Records Retention	6.10.2.p is added requiring that records of reviews performed for changes made to the ODCM and PCP be retained for the duration of the license.
6.14	Process Control Program (PCP)	Revised to be consistent with GL 89-01 controls for changes to the PCP. Adds a requirement for Plant Manager approval of changes in addition to SRB acceptance.

TABLE 1 (Continued)

Disposition of RETS Requirements Affected by LAR 90-0023

<u>SPECIFICATION</u>	<u>TITLE</u>	<u>DISPOSITION</u>
6.15	Offsite Dose Calculation Manual (ODCM)	Revised to be consistent with GL 89-01 controls for changes to the ODCM. Adds a requirement for Plant Manager approval of changes in addition to SRB acceptance.
6.16	Major changes to Radioactive Liquid, Gaseous and Solid Waste Treatment Systems.	Relocated to ODCM and PCP.