

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

SAXTON NUCLEAR FACILITY

Operating License No. DPR-4

Docket No. 50-146

Technical Specification Change Request No. 53, Rev. 3

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

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

BY: *Herb L. Lueder*

President, SNEC

Sworn and Subscribed
to before me this 2nd
day of April.

Diana M. DeBlasio

Notary Public

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

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I. Technical Specification Change Request No. 53

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

Replace pages A-1, A-2, A-3, A-4, and Figure 1.

II. Reasons For Change

This Technical Specification Change Request(TSCR) requests NRC authorization to remove the SNEC facility reactor support buildings and structures from the SNEC TS. The reactor support buildings and structures covered by this TSCR are the Control and Auxiliary(C&A) building, the Radioactive Waste and Disposal Facility(RWDF) building, the Refueling Water Storage Tank, the earthen filled Drum Storage Area, and the Pipe Tunnel. Additionally, this TSCR clarifies numerous sections in the TS, while deleting others.

The reactor Containment Vessel(CV) is not affected by this TSCR.

The changes to the current TS are summarized below:

TS A.1 has been revised for clarity.

TS A.2 has been revised to reflect that the exclusion area is within the SNEC property, and delete reference to the C&A and RWDF buildings, since they are being removed under this TSCR.

TS A.3 has been revised to reflect that principal activities are carried on within the Pennsylvania Electric Company property and not the Saxton Steam Generating Station property.

TS B.2.a has been revised to reflect that the "gate" to the exclusion area surrounding the CV shall be maintained locked.

TS B.2.b has been deleted since the RWDF will be removed by this TSCR.

TS B.2.c has been deleted since the C&A building will be removed by this TSCR.

TS B.2.d has been revised to replace the term "SSGS," which refers to the Saxton Steam Generating Station, with the term "PENELEC." This section has also been redesignated as TS B.2.b, under this TSCR.

TS B.3.b has been revised to refer to the Containment Vessel only, since it will be the only building remaining.

TS B.4.b has been revised to require that only the Containment Vessel shall be inspected at the lowest level for water. Reference to the RWDF building has been deleted since it will be removed under this TSCR. This section has also been revised to require that a gamma-spectral analysis be performed for any water found at the lowest level of the Containment Vessel. The revision also deletes the requirement to analyze for gross Beta activity. A gamma-spectral analysis provides a more accurate and useful description of the radiological characteristics of the sump water than does gross Beta analysis.

TS B.4.d has been revised to refer to the Saxton Nuclear Facility Radiation Protection Plan instead of the Saxton Nuclear Experimental Reactor Facility Radiation Protection Manual.

TS B.5.a has been revised to indicate that the 24 hour notification will be made to the Administrator of Region I, and the NRC Operations Center, and that the written follow up report will be sent to the Document Control Desk and the Administrator of Region I.

TS B.5.a.2 has been revised to refer to the Containment Vessel only, since it will be the only structure remaining.

TS B.5.a.3 has been deleted. This section required a 24 hour notification followed by a 15 day written report when a confirmed analysis of residual water from the Containment Vessel or RWDF building indicated that the activity concentration is above the limits of Table II, 10 CFR part 20 for unrestricted release.

Generally, on a quarterly basis, the confirmed value for some isotopes inside the containment vessel exceeded the limits in Table II and were reported, as required. However, this is routinely expected due to the condensation which collects in the sump. The sump water poses no threat to the health and safety of the public or to the environment because there are no release paths to the external environment from the containment vessel sump.

The water in the sump originates from condensation on the inside of the Containment Vessel, and is a consequence of a breather pipe which was installed to permit the vessel to breathe with changes in atmospheric conditions. As such, there is no safety concern and this administrative reporting requirement for this normal and routine condition may be deleted. SNEC will continue to periodically monitor, on a quarterly basis, the containment vessel sump water and report its findings in the required annual report.

TS B.5.b has been revised to include a time limit for submittal of the required Annual Report to the NRC. Also, reference to the Director, Division of Reactor Licensing, has been replaced with the Document Control Desk and the Administrator of Region I.

TS B.5.b.2 has been revised to delete reference to the RWDF building since it will be removed by this TSCR.

TS Figure 1 has been revised to show the new fence erected in front of the C&A building.

III. Safety Evaluation

In May 1972, the SNEC facility ended power operation and decommissioning and/or maintenance of the facility was begun and has continued since then.

Decontamination was performed in 1987, 1988, and 1989 to ensure that residual contamination was as low as reasonably achievable. A comprehensive final release survey was conducted from October 1988 to June 1989 to verify that residual contamination was within NRC guidelines for unrestricted use. Surface contamination measurements were compared to Regulatory Guide 1.86, "Termination of Operating Licenses for Nuclear Reactors."

The survey results showed that the residual radioactivity is less than the NRC guidelines for unrestricted use. The final release survey results were submitted to the NRC in 1990 and 1991.

An independent confirmatory survey was performed by Oak Ridge Associated University (ORAU) for the NRC during October 1990 and their report submitted to the NRC in June 1991.

The ORAU report states that the results of the confirmatory survey support the findings of the final survey performed by GPUN, and, in ORAU's opinion, confirm that the decontamination efforts have been successful in satisfying NRC guidelines for release for unrestricted use for the C&A building, RWDF building, and pipe tunnel of the SNEC facility. Additional information requested by the NRC in response to ORAU queries were also satisfactorily addressed by SNEC.

It should be noted that several areas were identified by SNEC as hold points, since they were inaccessible during the final release survey. These areas will be surveyed and dispositioned during dismantlement and demolition. The NRC will be notified of the status of each hold point and given the option to review the results before final disposition.

Based on the above discussion, as supported by the referenced reports, it is evident that the reactor support buildings and structures at the SNEC facility are decontaminated to acceptable levels. As such, the buildings and structures covered by this TSCR are eligible for release for unrestricted use, since they do not pose a nuclear safety concern. Their removal from the TS will not have any adverse impact on the health and safety of the public.

IV. No Significant Hazards Consideration

SNEC has determined that the TSCR poses no significant hazards as defined in 10 CFR 50.92. Unrestricted release and removal of the C&A building, RWDF building, Refueling Water Storage Tank, the earthen filled Drum Storage Area, and the Pipe Tunnel from the TS in accordance with the proposed TSCR will not:

