

ATTACHMENT "A"

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INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.10 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.

ACTION:

- a. With radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Specification, immediately suspend the release of radioactive liquid effluents monitored by the affected channel, or declare the channel inoperable.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-12. Restore the inoperable instrumentation to OPERABLE status within the time specified in the ACTION or, explain in the next Semiannual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.8, why this inoperability was not corrected within the time specified.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.10 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-8.

TABLE 3.3-12

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>		<u>MINIMUM CHANNELS OPERABLE</u>	<u>ACTION</u>
1.	RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE		
a.	Boric Acid Condensate Discharge	1	28
b.	Waste, Waste Condensate and Laundry Discharge	1	28
c.	Dry Cooling Tower Sumps	1/sump	29
d.	Turbine Building Industrial Waste Sump	1	29
2.	RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		
a.	Circulating Water Discharge (Blowdown Heat Exchanger and Auxiliary Component Cooling Water Pumps)	1	29
3.	FLOW RATE MEASUREMENT DEVICES		
a.	Boric Acid Condensate Discharge	1	30
b.	Waste, Waste Condensate and Laundry Discharge	1	30
c.	Turbine Building Industrial Waste Sump*	N.A.	N.A.
d.	Dry Cooling Tower Sumps*	N.A.	N.A.
e.	Circulating Water Discharge* (Blowdown Heat Exchanger and Auxiliary Component Cooling Water Pumps)	N.A.	N.A.

TABLE 3.3-12 (Continued)

TABLE NOTATIONS

*Pump performance curves generated in place shall be used to estimate flow.

ACTION STATEMENTS

- ACTION 28 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 14 days provided that prior to initiating a release:
- At least two independent samples are analyzed in accordance with Specification 4.11.1.1.1, and
 - At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge line valving;

Otherwise, suspend release of radioactive effluents via this pathway.

- ACTION 29 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are analyzed for radioactivity at a lower limit of detection of at least 10^{-7} microcurie/mL.
- At least once per 12 hours when the specific activity of the secondary coolant is greater than 0.01 microcurie/gram DOSE EQUIVALENT I-131.
 - At least once per 24 hours when the specific activity of the secondary coolant is less than or equal to 0.01 microcurie/gram DOSE EQUIVALENT I-131.

- ACTION 30 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided the flow rate is estimated at least once per 4 hours during actual releases. Pump performance curves generated in place may be used to estimate flow.

TABLE 4.3-8

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>SOURCE CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>
1. RADIOACTIVITY MONITORS PROVIDING ALARMS AND AUTOMATIC TERMINATION OF RELEASE				
a. Boric Acid Condensate Discharge	P	P	R(3)	Q(1)
b. Waste, Waste Condensate and Laundry Discharge	P	P	R(3)	Q(1)
c. Dry Cooling Tower Sumps	D	M	R(3)	Q(5)
d. Turbine Building Industrial Waste Sump	D	M	R(3)	Q(5)
2. RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE				
a. Circulating Water Discharge (Blowdown Heat Exchanger and Auxiliary Component Cooling Water Pumps)	D	M	R(3)	Q(2)
3. FLOW RATE MEASUREMENT DEVICES				
a. Boric Acid Condensate Discharge	D(4)	N.A.	R	Q
b. Waste, Waste Condensate and Laundry Discharge	D(4)	N.A.	R	Q
c. Turbine Building Industrial Waste Sump	N.A.	N.A.	N.A.	N.A.
d. Dry Cooling Tower Sumps	N.A.	N.A.	N.A.	N.A.
e. Circulating Water Discharge (Blowdown Heat Exchangers and Auxiliary Component Cooling Water Pumps)	N.A.	N.A.	N.A.	N.A.

TABLE 4.3-8 (Continued)

TABLE NOTATION

- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 1. Instrument indicates measured levels above the alarm/trip setpoint.
 2. Circuit failure.
 3. Instrument indicates a downscale failure.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
 1. Instrument indicates measured levels above the alarm setpoint.
 2. Circuit failure.
- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system for over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.
- (4) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.
- (5) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway occurs if the instrument indicates measured levels above the alarm/trip setpoint and that control room alarm annunciation occurs if any of the following conditions exists:
 1. Instrument indicates measured levels above the alarm set.
 2. Circuit failure.
 3. Instrument controls not set in operate mode.

3/4.11 RADIOACTIVE EFFLUENTS

3/4.11.1 LIQUID EFFLUENTS

CONCENTRATION

LIMITING CONDITION FOR OPERATION

3.11.1.1 The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (see Figure 5.1-3) shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2×10^{-4} microcurie/ml total activity.

APPLICABILITY: At all times.

ACTION:

With the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS exceeding the above limits, immediately restore the concentration to within the above limits.

SURVEILLANCE REQUIREMENTS

4.11.1.1.1 Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-1.

4.11.1.1.2 The results of the radioactivity analyses shall be used in accordance with the methodology and parameters in the ODCM to assure that the concentrations at the point of release are maintained within the limits of Specification 3.11.1.1.

TABLE 4.11-1

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

LIQUID RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) ^a (μCi/mL)
A. Batch Waste Release Tanks ^{b,f,g,h,i}	P Each Batch	P Each Batch	Principal Gamma Emitters ^c	5x10 ⁻⁷
1. Boric Acid Condensate			I-131	1x10 ⁻⁶
	P	M	Dissolved and Entrained Gases (Gamma Emitters)	1x10 ⁻⁵
2. Waste Condensate	One Batch/M			
	P Each Batch	M Composite ^d	H-3	1x10 ⁻⁵
3. Laundry Waste			Gross Alpha	1x10 ⁻⁷
4. Turbine Building Industrial Waste Sumps*	P Each Batch	Q Composite ^d	Sr-89, Sr-90	5x10 ⁻⁸
			Fe-55	1x10 ⁻⁶
5. Dry Cooling Tower Sumps #1 and #2*				
6. Regenerative Waste				
7. Filter Flush				
8. Waste				

*When release from this source is batch in nature.

TABLE 4.11-1 (Continued)

LIQUID RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) ^a (μCi/mL)
B. Continuous Releases, e, f, h, i	W Grab Sample	W	Principal Gamma Emitters ^c	5x10 ⁻⁷
1. Turbine Building Industrial Waste Sumps**			I-131	1x10 ⁻⁶
2. Dry Cooling Tower Sump #1**	M Grab Sample	M	Dissolved and Entrained Gases (Gamma Emitters)	1x10 ⁻⁵
3. Dry Cooling Tower Sump #2**	W Grab Sample	M Composite ^d	H-3	1x10 ⁻⁵
			Gross Alpha	1x10 ⁻⁷
4. Circulating Water Discharge- Steam Generator Blow-down HX	W Grab Sample	Q Composite ^d	Sr-89, Sr-90	5x10 ⁻⁸
			Fe-55	1x10 ⁻⁶
5. Auxiliary Component Cooling Water Pumps				

**When release from this source is continuous in nature.

TABLE 4.11-1 (Continued)

TABLE NOTATION

^aThe LLD is defined, for purposes of these specifications, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system, which may include radiochemical separation:

$$LLD = \frac{4.66 s_b}{E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above, as microcuries per unit mass or volume,

s_b is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,

E is the counting efficiency, as counts per disintegration,

V is the sample size in units of mass or volume,

2.22×10^6 is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield, when applicable,

λ is the radioactive decay constant for the particular radionuclide, and

Δt for plant effluents is the elapsed time between the midpoint of sample collection and the time of counting.

Typical values of E, V, Y, and Δt should be used in the calculation.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

^bA batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses, each batch shall be isolated, and then thoroughly mixed by a method described in the ODCM to assure representative sampling.

TABLE 4.11-1 (Continued)

TABLE NOTATIONS

^cThe principal gamma emitters for which the LLD specification applies include the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.8.

^dA composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen that is representative of the liquids released.

^eA continuous release is the discharge of liquid wastes of a nondiscrete volume, e.g., from a volume of a system that has an input flow during the continuous release.

^fPrior to analyses, all samples taken for the composite shall be thoroughly mixed in order for the composite sample to be representative of the effluent release.

^gIf the contents of the filter flush tank or the regenerative waste tank contain detectable radioactivity, no discharges from these tanks shall be made to the UNRESTRICTED AREA and the contents of these tanks shall be directed to the liquid radwaste treatment system.

^hTurbine Building Industrial Waste Sump (TBIWS)

The TBIWS shall be required to be sampled and analyzed in accordance with this table if any of the following conditions exist:

- (1) Primary to secondary leakage is occurring; or,
- (2) Activity is present in the secondary system as indicated by either the SGB monitors or secondary sampling and analysis; or,
- (3) Activity was present in the TBIWS during the previous 4 weeks.

If none of the above situations exists, then the sampling and analysis of this stream need not be performed.

ⁱSampling and analysis of the dry cooling tower sumps and the auxiliary component cooling water pump discharge will be required only when detectable activity exists in the CCW.

Sampling and analysis of the circulating water discharge-steam generator blowdown heat exchanger discharge (CWD-SGB) will be required only when detectable activity exists in the secondary system.

ATTACHMENT "B"

TABLE 3.3-12

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>		<u>MINIMUM CHANNELS OPERABLE</u>	<u>ACTION</u>
1.	RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE		
a.	Boric Acid Condensate Discharge	1	28
b.	Waste, Waste Condensate and Laundry Discharge	1	28
c.	Dry Cooling Tower Sumps	1/sump	29
d.	Turbine Building Industrial Waste Sump	1	29
e.	Circulating Water Discharge (Blowdown and Blowdown Heat Exchanger and Auxiliary Component Cooling Water Pumps)#	1	29
2.	CONTINUOUS COMPOSITE SAMPLERS		
a.	Steam Generator Blowdown Effluent Line	1	29
3.	FLOW RATE MEASUREMENT DEVICES		
a.	Boric Acid Condensate Discharge	1	30
b.	Waste, Waste Condensate and Laundry Discharge	1	30
c.	Turbine Building Industrial Waste Sump*	N.A.	N.A.
d.	Dry Cooling Tower Sumps*	N.A.	N.A.
e.	Circulating Water Discharge* (Blowdown and Blowdown Heat Exchanger and Auxiliary Component Cooling Water Pumps)	N.A.	N.A.

AUTOMATIC TERMINATION OF BLOWDOWN DISCHARGE ONLY

TABLE 4.3-8

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>		<u>CHANNEL CHECK</u>	<u>SOURCE CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>
1.	RADIOACTIVITY MONITORS PROVIDING ALARMS AND AUTOMATIC TERMINATION OF RELEASE				
a.	Boric Acid Condensate Discharge	P	P	R(3)	Q(1)
b.	Waste, Waste Condensate and Laundry Discharge	P	P	R(3)	Q(1)
c.	Dry Cooling Tower Sumps	D	M	R(3)	Q(5)
d.	Turbine Building Industrial Waste Sump	D	M	R(3)	Q(5)
e.	Circulating Water Discharge (Blowdown and Blowdown Heat Exchanger and Auxiliary Component Cooling Water Pumps)#	D	M	R(3)	Q(5)
2.	CONTINUOUS COMPOSITE SAMPLERS				
a.	Steam Generator Blowdown Effluent Line	D(6)	N.A.	R	Q
3.	FLOW RATE MEASUREMENT DEVICES				
a.	Boric Acid Condensate Discharge	D(4)	N.A.	R	Q
b.	Waste, Waste Condensate and Laundry Discharge	D(4)	N.A.	R	Q
c.	Turbine Building Industrial Waste Sump	N.A.	N.A.	N.A.	N.A.
d.	Dry Cooling Tower Sumps	N.A.	N.A.	N.A.	N.A.
e.	Circulating Water Discharge (Blowdown and Blowdown Heat Exchangers and Auxiliary Component Cooling Water Pumps)	N.A.	N.A.	N.A.	N.A.

AUTOMATIC TERMINATION OF BLOWDOWN DISCHARGE ONLY

TABLE 4.3-8 (Continued)

TABLE NOTATION

- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 1. Instrument indicates measured levels above the alarm/trip setpoint.
 2. Circuit failure.
 3. Instrument indicates a downscale failure.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
 1. Instrument indicates measured levels above the alarm setpoint.
 2. Circuit failure.
- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system for over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.
- (4) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.
- (5) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway occurs if the instrument indicates measured levels above the alarm/trip setpoint and that control room alarm annunciation occurs if any of the following conditions exists:
 1. Instrument indicates measured levels above the alarm set.
 2. Circuit failure.
 3. Instrument controls not set in operate mode.
- (6) CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous releases are made to the Circulating Water System or Waterford 3 waste pond.

TABLE 4.11-1 (Continued)

LIQUID RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) ^a (uCi/mL)
B. Continuous Releases e,f,j	W Continuous	W Composite ^d	Principal Gamma Emitters ^c	5×10^{-7}
6. Steam Generator Blowdown Discharge			I-131	1×10^{-6}
	M Grab Sample	M	Dissolved and Entrained Gases (Gamma Emitters)	1×10^{-5}
	W Continuous	M Composite ^d	H-3	1×10^{-5}
			Gross Alpha	1×10^{-7}
	W Continuous	Q Composite ^d	Sr-89, Sr-90	5×10^{-8}
			Fe-55	1×10^{-6}

Table 4.11-1 (Continued)

TABLE NOTATIONS

¹Sampling and analysis of the steam generator blowdown will be required only when the blowdown is directed to the circulating water system or Waterford 3 waste pond.

Steam generator blowdown to the Waterford 3 waste pond will be limited to situations requiring secondary chemistry control where the Circulating Water System is not available or the secondary chemistry is outside the requirements for Circulating Water System discharge. Blowdown to the waste pond will be terminated upon detection of sample activity greater than the LLD levels of Table 4.11-1 Section B.