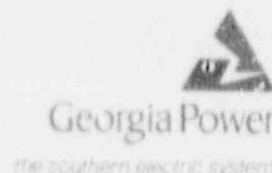


C. K. McCoy  
Vice President, Nuclear  
Vogtle Project



September 17, 1992

ELV-03972

Docket Nos. 50-424  
50-425

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT  
REQUEST TO REVISE TECHNICAL SPECIFICATIONS  
IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS**

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.59, Georgia Power Company hereby proposes to amend the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81.

As part of Georgia Power Company's strategy to facilitate implementation of the new 10 CFR 20 requirements at VEGP, a response to Nuclear Regulatory Commission (NRC) Generic Letter 89-01 was submitted on March 4, 1992. Generic Letter 89-01 allows the procedural details contained in the Radiological Effluent Technical Specifications (RETS) to be relocated to the Offsite Dose Calculation Manual (ODCM) and the Process Control Program (PCP) with appropriate programmatic controls being incorporated into the Administrative Controls Section of the Technical Specifications. Accordingly, the programmatic controls will be used to revise the RETS requirements located in the ODCM and PCP to reflect the new 10 CFR 20 requirements. However, the RETS requirements that will be relocated to the ODCM and PCP in accordance with Generic Letter 89-01 do not represent all of the Technical Specification requirements that are impacted by the new 10 CFR 20 requirements.

The proposed changes and bases for the changes are described in enclosure 1 to this letter. enclosure 2 provides an evaluation pursuant to 10 CFR 50.92 showing that the proposed changes do not involve significant hazards considerations. A copy of the proposed changes is provided in enclosure 3 which represent the remaining scope of Technical Specification requirements that are impacted by the new 10 CFR 20 requirements. Several of the proposed

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Technical Specification changed pages submitted by Georgia Power Company letter dated March 4, 1992, in response to Generic Letter 89-01 are also affected by the revisions to 10 CFR 20. Therefore, for completeness, the affected proposed Technical Specification changed pages provided in enclosure 3 also incorporate the Generic Letter 89-01 changes. In addition, all of the proposed Technical Specification changes associated with the new 10 CFR 20 requirements have been "clouded" to distinguish them from the Generic Letter 89-01 changes. Accordingly, it is requested that a single license amendment be issued which combines the effect of this submittal with the March 4, 1992, submittal.

Georgia Power Company requests that these proposed Technical Specification changes be approved by the NRC no later than December 1, 1992, to facilitate implementation of the new 10 CFR 20 requirements at VEGP as early as January 1, 1993. Based on the original published date of January 1, 1993, Georgia Power Company has committed significant funding and manpower resources to meeting that date. Postponing implementation could have budgetary impacts and impose conflicts with manpower resource allocation. In the event unforeseen circumstances delay implementation of the new 10 CFR 20 requirements past the January 1, 1993, date, it is requested that the conditions of the license amendment be made effective upon implementation of the new 10 CFR 20 requirements by Georgia Power Company but no later than January 1, 1994.

In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

Mr. C. K. McCoy states that he is a vice president of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company and that, to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

**GEORGIA POWER COMPANY**

By:

C. K. McCoy  
C. K. McCoy

Sworn to and subscribed before me this 17<sup>th</sup> day of SEPTEMBER, 1992.

Mary A. Bentley  
Notary Public

MY COMMISSION EXPIRES MAY 5, 1995

U. S. Nuclear Regulatory Commission

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CKM/TMM

Enclosures

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Proposed Technical Specification Changes

c(w): Georgia Power Company

Mr. W. B. Shipman

Mr. M. Sheibani

NORMS

U. S. Nuclear Regulatory Commission

Mr. S. D. Ebner, Regional Administrator

Mr. D. S. Hood, Licensing Project Manager, NRR

Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia

Mr. J. D. Tanner, Commissioner, Department of Natural Resources

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT  
REQUEST TO REVISE TECHNICAL SPECIFICATIONS  
IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

BASIS FOR PROPOSED CHANGE

## ENCLOSURE 1

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### BASIS FOR PROPOSED CHANGE

##### Proposed Change 1

This proposed change revises the definitions of MEMBER(S) OF THE PUBLIC (Technical Specification 1.18) and UNRESTRICTED AREA (Technical Specification 1.39).

##### Basis

The definitions of MEMBER(S) OF THE PUBLIC and UNRESTRICTED AREA are being changed to be consistent with their respective definitions contained in the new 10 CFR 20.1003. These changes are simply administrative in nature to facilitate implementation of the new 10 CFR 20 requirements at Vogtle Electric Generating Plant (VEGP). The requirements of the VEGP Technical Specifications will not be reduced by this change.

##### Proposed Change 2

This proposed change revises proposed footnote c to Technical Specification Table 3.3-3 which was submitted by Georgia Power Company letter dated March 4, 1992, in response to Generic Letter 89-01.

##### Basis

Footnote c to table 3.3-3 contains a reference to Specification 3.11.2.1. Georgia Power Company's response to Generic Letter 89-01 included a proposed change to the Technical Specifications to change that reference to Specification 6.7.4.f. Upon further review of this proposed change to support implementation of the new 10 CFR 20 requirements at VEGP, it was determined that the footnote reference should have been more specific by referencing Specification 6.7.4.f.7. Specification 6.7.4.f, as proposed in the March 4, 1992, submittal, includes references to several limits such as liquid and gaseous release rates, liquid and gaseous cumulative doses, and 40 CFR 190. However, footnote c deals with gaseous release rate limits only, which specifically relates to the requirements found in proposed Specification 6.7.4.f.7. Therefore, the footnote c reference to Specification 3.11.2.1 is being changed to proposed Specification 6.7.4.f.7 instead of 6.7.4.f.

## ENCLOSURE 1 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### BASIS FOR PROPOSED CHANGE

##### Proposed Change 3

This proposed change revises Technical Specification Bases 3/4.11.1.4 to reference the acceptance criteria contained in the new 10 CFR 20, which is used to determine the activity limit for the radioactive effluent liquid holdup tanks.

##### Basis

The discussion in Bases 3/4.11.1.4 is modified to state that in the event of an uncontrolled release of the outside temporary holdup tanks, the resulting concentration would be less than the effluent concentration limits (ECL) of the new 10 CFR 20.1302(b)(2)(i) in lieu of the limits specified in the old 10 CFR 20, Appendix B, Table II, Column 2, which are based on maximum permissible concentration (MPC) values.

An evaluation was performed to determine the activity that could be released from a tank rupture based on ECL values as compared to the current Technical Specification (3.11.1.4) limit of 10 curies, which is based on MPC values contained in the old 10 CFR 20. The evaluation provided a larger allowable tank activity based on the ECL values. Since a higher activity limit can be determined based on the ECL values, it is conservative to retain the current activity limit of 10 curies. Maintaining the activity limit at 10 curies is also consistent with the guidance contained in NUREG-0133, which states that the curie limit for a temporary tank should be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained gases, which is consistent with Technical Specification 3.11.1.4.

##### Proposed Change 4

This proposed change revises proposed Technical Specification 6.7.4.f.2 submitted by Georgia Power Company letter dated March 4, 1992, in response to Generic Letter 89-01, in order to accommodate needed operational flexibility to facilitate implementation of the new 10 CFR 20 requirements.

##### Basis

Proposed Technical Specification 6.7.4.f.2 submitted by Georgia Power Company letter dated March 4, 1992, states that liquid effluent releases to unrestricted areas must conform to the old 10 CFR 20, Appendix B, Table II, Column 2. In accordance with the old 10 CFR 20,



## ENCLOSURE 1 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### BASIS FOR PROPOSED CHANGE

the annual dose to a member of the public upon which these concentrations are based is 500 mrem. Although the old 10 CFR 20.106 allows effluent concentrations to be averaged over a year, the Technical Specifications require that liquid effluent releases be limited to these concentrations at all times (i.e., for instantaneous releases). More restrictive limits were incorporated into the Technical Specifications by the NRC to assure that the dose limits of 10 CFR 50, Appendix I or the dose limits of 40 CFR 190 are not exceeded.

The basic requirements for Technical Specifications on effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent Technical Specifications will keep average annual releases of radioactive material in effluents at small percentages of the limits specified in the old 10 CFR 20.106. These requirements further indicate that operational flexibility is allowed, compatible with considerations of health and safety, which may temporarily result in releases higher than such small percentages, but still within the limits specified in the old 10 CFR 20.106 which reference Appendix B, Table II concentrations. These referenced concentrations are specific values which relate to an annual dose of 500 mrem. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be exerted to keep levels of radioactive materials in effluents as low as is reasonably achievable as set forth in 10 CFR 50, Appendix I.

In accordance with the Introduction to Appendix B of the new 10 CFR 20, the liquid effluent concentration limits stated in Appendix B, Table 2, Column 2, are based on a dose of 50 mrem in a year. Therefore, the previous NRC position that effluent releases must be limited by Technical Specifications to the concentrations stated in the old 10 CFR 20, Appendix B, Table II, Column 2, at all times, does not appear to be warranted for the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, because the requirements of 10 CFR 50.36a are presented in terms of the old 10 CFR 20.106, which relates to an annual dose of 500 mrem, not 50 mrem. Since a release concentration which corresponds to a limiting value of 500 mrem in a year (as a dose rate of 500 mrem/year) has been acceptable as a Technical Specification limit for liquid effluents and which applies at all times as an assurance that the limits of 10 CFR 50, Appendix I are not likely to be exceeded, it should not be necessary to reduce this limit by a factor of ten.

In Subpart D, Section VI, of the Supplemental Information which accompanied the new 10 CFR 20, it is stated that for power reactor licensees, compliance with the limits of

## ENCLOSURE 1 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### BASIS FOR PROPOSED CHANGE

10 CFR 50, Appendix I and with the limits of 40 CFR 190 will demonstrate compliance with the limits of the new 10 CFR 20.1301, in which dose limits for members of the public are specified. The limits in 10 CFR 50, Appendix I and 40 CFR 190 are specified as annual dose limits, therefore, dose determinations to show compliance with these requirements are in terms of cumulative doses (doses in a quarter or year for Appendix I and doses in a year for 40 CFR 190). If a dose limit of 50 mrem in a year were included in a Technical Specification as a limit which applies at all times (i.e., a dose rate of 50 mrem/year), operational flexibility would not be available because the dose rate limit would already be very close to the dose limits specified in 10 CFR 50, Appendix I and 40 CFR 190.

Operational history at VEGP has demonstrated that the use of the concentration values associated with the old 10 CFR 20.106 as Technical Specification limits which apply at all times has resulted in calculated doses to a member of the public that are small percentages of the limits of 10 CFR 50, Appendix I. Therefore, the use of concentration values which correspond to annual doses of 500 mrem (ten times the concentration values stated in the new 10 CFR 20, Appendix B, Table 2, Column 2) should not have a negative impact on the ability to continue to operate within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

Having the operational flexibility discussed above is especially important in establishing a basis for effluent monitor setpoint calculations. As discussed above, the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, relate to a dose of 50 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate of 50 mrem/year. Such a low value is impractical for use as a basis for effluent monitor setpoint calculations for many liquid effluent release situations when monitor background, monitor sensitivity, and monitor performance must be taken into account.

Therefore, to accommodate operational flexibility needed for effluent releases, proposed Technical Specification 6.7.4.f.2 submitted by Georgia Power Company letter dated March 4, 1992, is being revised by restating the limit as ten times the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, to apply at all times. The multiplier of ten is proposed because the annual dose of 500 mrem, upon which the concentrations in the old 10 CFR 20, Appendix B, Table II, Column 2, are based, is a factor of 10 higher than the annual dose of 50 mrem, upon which the concentrations in the new 10 CFR 20, Appendix B, Table 2, Column 2, are based. Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I and 40 CFR 190.



## ENCLOSURE 1 (CONTINUED)

### WINGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### BASIS FOR PROPOSED CHANGE

##### Proposed Change 5

This proposed change revises proposed Technical Specifications 6.7.4.f.3 and 6.13.2.a.2 submitted by Georgia Power Company letter dated March 4, 1992, in response to Generic Letter 89-01, to incorporate the new 10 CFR 20 reference regarding dose limits for individual members of the public.

##### Basis

Proposed Technical Specifications 6.7.4.f.3 and 6.13.2.a.2 submitted by Georgia Power Company letter dated March 4, 1992, contained the Generic Letter 89-01 reference to the old 10 CFR 20.106 regarding radioactivity in effluents to unrestricted areas. This reference is being revised to incorporate the new 10 CFR 20 reference to paragraph 10 CFR 20.1302 which supersedes the old 10 CFR 20 reference to paragraph 10 CFR 20.106. This change is simply administrative in nature in order to facilitate implementation of the new 10 CFR 20 requirements at VEGP.

##### Proposed Change 6

This proposed change revises proposed Technical Specification 6.7.4.f.7 submitted by Georgia Power Company letter dated March 4, 1992, in response to Generic Letter 89-01, in order to accommodate needed operational flexibility to facilitate implementation of the new 10 CFR 20 requirements.

##### Basis

Proposed Technical Specification 6.7.4.f.7 submitted by Georgia Power Company letter dated March 4, 1992, states that gaseous effluent releases to areas beyond the site boundary must conform to the doses associated with the old 10 CFR 20, Appendix B, Table II, Column 1. In accordance with the old 10 CFR 20, the annual dose to a member of the public upon which these concentrations are based is 500 mrem. Although the old 10 CFR 20.106 allows effluent concentrations to be averaged over a year, the Technical Specifications require that gaseous effluent releases be limited to a dose rate of 500 mrem/year (total body) which corresponds to these concentrations at all times (i.e., for instantaneous releases). More restrictive limits were incorporated into the Technical Specifications by the NRC to assure that the dose limits of 10 CFR 50, Appendix I or the dose limits of 40 CFR 190 are not exceeded.

## ENCLOSURE 1 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### BASIS FOR PROPOSED CHANGE

The basic requirements for Technical Specifications on effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent Technical Specifications will keep average annual releases of radioactive material in effluents at small percentages of the limits specified in the old 10 CFR 20.106. These requirements further indicate that operational flexibility is allowed, compatible with considerations of health and safety, which may temporarily result in releases higher than such small percentages, but still within the limits specified in the old 10 CFR 20.106 which references Appendix B, Table II concentrations. These referenced concentrations are specific values which relate to an annual dose of 500 mrem. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be exerted to keep levels of radioactive materials in effluents as low as is reasonably achievable as set forth in 10 CFR 50, Appendix I.

In accordance with the Introduction to Appendix B of the new 10 CFR 20, the gaseous effluent concentration limits stated in Appendix B, Table 2, Column 1, are based on a dose of 50 mrem in a year. Therefore, the previous NRC position that effluent releases must be limited by Technical Specifications to the concentrations stated in the old 10 CFR 20, Appendix B, Table II, Column 1, at all times, does not appear to be warranted for the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 1, because the requirements of 10 CFR 50.36a are presented in terms of the old 10 CFR 20.106, which relates to an annual dose of 500 mrem, not 50 mrem. Since a release concentration, which corresponds to a limiting value of 500 mrem in a year (as a dose rate of 500 mrem/year) has been acceptable as a Technical Specification limit for gaseous effluents, which applies at all times as an assurance that the limits of 10 CFR 50, Appendix I are not likely to be exceeded, it should not be necessary to reduce this limit by a factor of ten.

In Subpart D, Section VI, of the Supplementary Information which accompanied the new 10 CFR 20, it is stated that for power reactor licensees, compliance with the limits of 10 CFR 50, Appendix I and with the limits of 40 CFR 190 will demonstrate compliance with the limits of the new 10 CFR 20.1301, in which dose limits for members of the public are specified. The limits in 10 CFR 50, Appendix I and 40 CFR 190 are specified as annual dose limits; therefore, dose determinations to show compliance with these requirements are in terms of cumulative doses (doses in a quarter or year for Appendix I and doses in a year for 40 CFR 190). If a dose limit of 50 mrem in a year were included in a Technical Specification as a limit which applies at all times (i.e., a dose rate of 50 mrem/year), operational flexibility would not be available because the dose rate limit would already be very close to the dose limits specified in 10 CFR 50, Appendix I and 40 CFR 190.

## ENCLOSURE 1 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### BASIS FOR PROPOSED CHANGE

Operational history at VEGP has demonstrated that the use of the concentration values associated with the old 10 CFR 20.106 as Technical Specification limits which apply at all times has resulted in calculated doses to a member of the public that are small percentages of the limits of 10 CFR 50, Appendix I. Therefore, the use of concentration values which correspond to annual doses of 500 mrem (ten times the concentration values stated in the new 10 CFR 20, Appendix B, Table 2, Column 1) should not have a negative impact on the ability to continue to operate within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

Having the operational flexibility discussed above is especially important in establishing a basis for effluent monitor setpoint calculations. As discussed above, the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 1, relate to a dose of 50 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate of 50 mrem/year. Such a low value is impractical for use as a basis for effluent monitor setpoint calculations for many gaseous effluent release situations when monitor background, monitor sensitivity, and monitor performance must be taken into account.

Therefore, to accommodate operational flexibility needed for effluent releases, proposed Technical Specification 6.7.4.f.7 submitted by Georgia Power Company letter dated March 4, 1992, is being revised by restating the limit as ten times the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 1, to apply at all times. The multiplier of ten is proposed because the annual dose of 500 mrem, upon which the concentrations in the old 10 CFR 20, Appendix B, Table II, Column 1, are based, is a factor of ten higher than the annual dose of 50 mrem, upon which the concentrations in the new 10 CFR 20, Appendix B, Table 2, Column 1, are based. Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

#### Proposed Change 7

This proposed change revises Technical Specification 6.8.1.2 by updating footnote \* to incorporate the new 10 CFR 20 reference regarding reports of individual monitoring.

#### Basis

Footnote \* to Technical Specification 6.8.1.2 currently contains the old 10 CFR 20 reference to paragraph 20.407 regarding personnel monitoring reports. This reference is being revised to incorporate the new 10 CFR 20 reference to paragraph 20.2206 which supersedes the old

## ENCLOSURE 1 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### BASIS FOR PROPOSED CHANGE

10 CFR 20 reference to paragraph 20.407. This change does not reduce the reporting requirements contained in Technical Specification 6.8.1.2. This change is simply administrative in nature to facilitate implementation of the new 10 CFR 20 requirements at VEGP.

#### Proposed Change 8

This proposed change revises Technical Specification 6.11.1 by incorporating the new 10 CFR 20 references related to the control of access to high radiation areas.

#### Basis

Technical Specification 6.11.1 currently contains the old 10 CFR 20 references to paragraphs 20.203(c)(5) and 20.203(c) regarding caution signs, labels, signals, and controls. These references are being revised to incorporate the new 10 CFR 20 references to paragraphs 20.1601(c) and 20.1601, respectively, which supersede the old 10 CFR 20 references. This change will not decrease the effectiveness of the radiation protection programs at VEGP to provide control of exposure from external sources in restricted areas. This change is simply administrative in nature in order to facilitate implementation of the new 10 CFR 20 requirements at VEGP.

#### Proposed Change 9

This proposed change revises Technical Specifications 6.11.1 and 6.11.2 to incorporate the new 10 CFR 20 requirements regarding the distance used to make measurements of a source of radioactivity to determine the dose an individual might receive in 1 hour.

#### Basis

Technical Specifications 6.11.1 currently contains a requirement that measurements be made at 45 cm (18 in.) from a source of radiation to determine if radiation intensity is greater than 100 mrem/hr but less than 1000 mrem/hr. Similarly, Technical Specification 6.11.2 contains a requirement that measurements be made at 45 cm (18 in.) from a radiation source to determine if the radiation level is greater than 1000 mrem/hr. This distance is being changed

ENCLOSURE 1 (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT  
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IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

BASIS FOR PROPOSED CHANGE

to a value of 30 cm (12 in.), consistent with the requirements of the new 10 CFR 20.1601(a)(1). This represents a conservative change since 30 cm (12 in.) is a shorter distance that will result in higher dose measurements.



ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT  
REQUEST TO REVISE TECHNICAL SPECIFICATIONS  
IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

10 CFR 50.92 EVALUATION

## ENCLOSURE 2

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### 10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, Georgia Power Company has evaluated the proposed revisions to the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications and has determined that operation of the facility in accordance with the proposed amendment would not involve any significant hazards considerations.

#### Background

By letter dated March 4, 1992, Georgia Power Company submitted proposed changes to the Technical Specifications in response to Generic Letter 89-01 which allows the procedural details contained in the Radiological Effluent Technical Specifications (RETS) to be relocated to the Offsite Dose Calculation Manual (ODCM) and the Process Control Program (PCP) with appropriate programmatic controls being incorporated into the Administrative Controls Section of the Technical Specifications. Following approval by the Nuclear Regulatory Commission, the programmatic controls will be used to revise the procedural details of the RETS, which will be incorporated into the ODCM and PCP to reflect the new 10 CFR 20 requirements. However, the scope of Generic Letter 89-01 does not encompass all of the Technical Specification requirements that are impacted by the new 10 CFR 20. Additional Technical Specification changes have been identified, as discussed in enclosure 1, which are needed in conjunction with the Generic Letter 89-01 response to facilitate Georgia Power Company's goal of implementing the new 10 CFR 20 requirements at VEGP.

#### Analysis

The proposed changes to the Technical Specifications are required in order to implement the new 10 CFR 20 requirements at VEGP. The proposed Technical Specification changes involve (1) revisions to the Bases and Administrative Controls Section to appropriately incorporate the new 10 CFR 20 references, (2) revisions to the Administrative Controls Section changes submitted by Georgia Power Company letter dated March 4, 1992, in response to Generic Letter 89-01 to provide operational flexibility needed for liquid and gaseous releases, and (3) revisions to the Administrative Controls Section regarding the distance used to make measurements of radioactivity to determine if the major portion of a body can receive an excessive exposure. The details concerning each of these proposed changes are provided in enclosure 1. The level of radiological control will not be reduced by these proposed changes since compliance with applicable regulatory requirements governing radioactive effluents and radiological environmental monitoring, including 10 CFR 50.36a, 10 CFR 50, Appendix I and 40 CFR 190, will continue to be maintained.

## ENCLOSURE 2 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### 10 CFR 50.92 EVALUATION

##### Conclusion

Based on the above considerations, Georgia Power Company has concluded the following concerning 10 CFR 50.92.

##### Evaluation of Proposed Changes 1, 2, 3, 5, 7, and 8

1. The proposed changes to the Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously evaluated because they are administrative in nature since they correct specific definitions and old references to 10 CFR 20 in order to facilitate implementation of the new 10 CFR 20 requirements. The proposed changes do not alter the conditions or assumptions in any of the (Final Safety Analysis Report) FSAR accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes.
2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because they are administrative in nature and do not involve any change to the configuration or method of operation of any plant equipment. Accordingly, no new failure modes have been defined for any plant system or component important to safety nor has any new limiting single failure been identified as a result of the proposed changes. Also, there will be no change in types or increase in the amount of effluents released offsite.
3. The proposed changes do not involve a significant reduction in a margin of safety because they are administrative in nature and do not reduce the effectiveness of the radiation protection programs at VEGP. Also, the proposed changes do not involve any actual change in the methodology used in the control of solid radioactive wastes or radiological environmental monitoring. The methodology that will be used in the control of radioactive effluents will result in the same effluent release rate as the current methodology now being used.

##### Evaluation of Proposed Changes 4 and 6

1. The proposed changes to the Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously evaluated because the operational flexibility needed for effluent releases is needed to facilitate

## ENCLOSURE 2 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### 10 CFR 50.92 EVALUATION

implementation of the new 10 CFR 20 requirements. Compliance with applicable regulatory requirements will continue to be maintained. The proposed changes do not alter the conditions or assumptions in any of the FSAR accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the operational flexibility needed for effluent releases does not involve any change to the configuration or method of operation of any plant equipment. Accordingly, no new failure modes have been defined for any plant system or component important to safety nor has any new limiting single failure been identified as a result of the proposed changes. Also, there will be no change in types or increase in the amount of effluents released offsite.
3. The proposed changes do not involve a significant reduction in a margin of safety because the operational flexibility needed for effluent releases does not reduce the effectiveness of the radiation protection programs at VEGP. The proposed changes do not involve any actual change in the methodology used in the control of solid radioactive wastes or radiological environmental monitoring. The methodology that will be used in the control of radioactive effluents will result in the same effluent release rate as the current methodology now being used. The operational flexibility needed for effluent releases allows the use of concentration values ten times the values given in the new 10 CFR 20. However, this is acceptable since annual doses will be limited to the doses specified in 10 CFR 50, Appendix I and 40 CFR 190.

#### Evaluation of Proposed Change 9

1. The proposed changes to the Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed distance to be used to make measurements of a source of radioactivity to control access to high radiation areas is needed in order to facilitate implementation of the new 10 CFR 20 requirements. The proposed changes do not alter the conditions or assumptions in any of the FSAR accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes.

## ENCLOSURE 2 (CONTINUED)

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS IMPLEMENTATION OF THE NEW 10 CFR 20 REQUIREMENTS

#### 10 CFR 50.92 EVALUATION

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because they do not involve any change to the configuration or method of operation of any plant equipment. Only the distance to be used to make measurements of a source of radioactivity to control access to high radiation areas is being changed. Accordingly, no new failure modes have been defined for any plant system or component important to safety nor has any new limiting single failure been identified as a result of the proposed changes. Also, there will be no change in types or increase in the amount of effluents released offsite.
3. The proposed changes do not involve a significant reduction in a margin of safety because a shorter distance will be used to make measurements of a source of radioactivity to control access to high radiation areas. This is a conservative change which will result in higher dose measurements. Therefore, the effectiveness of the radiation protection programs at VEGP will not be reduced.

Based on the preceding information, it has been determined that the proposed Technical Specification changes do not involve a significant hazards consideration as defined by 10 CFR 50.92(c).