

ENCLOSURE 3

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

PROPOSED TECHNICAL SPECIFICATION CHANGES

9209240439 920917
PDR ADDCK 05000424
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DEFINITIONS

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DEFINITIONS

means an individual in a controlled area or UNRESTRICTED AREA. However, an individual is not a MEMBER OF THE PUBLIC

MEMBER OF THE PUBLIC

during any period in which the individual receives an occupational dose.

1.18 ~~MEMBER OF THE PUBLIC~~ shall include all persons who are not occupationally associated with the plant. This category does not include employees of the licensee, its contractors, or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.

OFFSITE DOSE CALCULATION MANUAL

resulting from

1.19 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses due to radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program.

INSERT 1

OPERABLE - OPERABILITY

1.20 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL MODE - MODE

1.21 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.2.

PHYSICS TESTS

1.22 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation: (1) described in Chapter 14.0 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.23 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a nonisolable fault in a Reactor Coolant System component body, pipe wall, or vessel wall.

PROCESS CONTROL PROGRAM

1.24 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, and Federal and State

DEFINITIONS

SOLIDIFICATION

~~Deleted.~~

~~1.33 A SOLIDIFICATION shall be the conversion of wet waste into a form that meets shipping and burial ground requirements.~~

SOURCE CHECK

1.34 A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.

STAGGERED TEST BASIS

1.35 A STAGGERED TEST BASIS shall consist of:

- a. A test schedule for n systems, subsystems, trains, or other designated components obtained by dividing the specified test interval into n equal subintervals, and
- b. The testing of one system, subsystem, train, or other designated component at the beginning of each subinterval.

THERMAL POWER

1.36 THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

TRIP ACTUATING DEVICE OPERATIONAL TEST

1.37 A TRIP ACTUATING DEVICE OPERATIONAL TEST shall consist of operating the Trip Actuating Device and verifying OPERABILITY of alarm, interlock and/or trip functions. The TRIP ACTUATING DEVICE OPERATIONAL TEST shall include adjustment, as necessary, of the Trip Actuating Device such that it actuates at the required Setpoint within the required accuracy.

UNIDENTIFIED LEAKAGE

1.38 UNIDENTIFIED LEAKAGE shall be all leakage which is not IDENTIFIED LEAKAGE or CONTROLLED LEAKAGE.

UNRESTRICTED AREA

~~1.39 An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.~~

UNRESTRICTED AREA means an area, access to which is neither limited nor controlled by the licensee.

TABLE 3.3-3 (Continued)

TABLE NOTATIONS

*Time constants utilized in the lead-lag controller for Steam Line Pressure-Low are $\tau_1 \geq 50$ seconds and $\tau_2 \leq 5$ seconds. CHANNEL CALIBRATION shall ensure that these time constants are adjusted to these values.

**The time constant utilized in the rate-lag controller for Steam Line Pressure-Negative Rate-High is greater than or equal to 50 seconds. CHANNEL CALIBRATION shall ensure that this time constant is adjusted to this value.

#Feedwater isolation only. Turbine trip occurs on reactor trip.

^aDuring refueling operations.

^bDuring power operation. This is an initial setpoint only. The trip setpoint will be set at 50 times background level. Background level should be determined at or near the end of the first fuel cycle.

^cSetpoints will not exceed the limits of Specification ~~3.1.2.1.~~

~~6.7.4.f.~~
6.7.4.f.7

RADIOACTIVE EFFLUENTS

BASES

DOSE (Continued)

Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I, "Revision 1, October 1977 and Regulatory Guide 1.113, "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I," April 1977. **DELETED**

This specification applies to the release of radioactive materials in liquid effluents from each unit at the site. When shared Radwaste Treatment Systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the Radwaste Treatment System. For determining conformance to LCOs, these allocations from shared Radwaste Treatment Systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

3/4.11.1.3 LIQUID RADWASTE TREATMENT SYSTEM

~~Not used. The OPERABILITY of the Liquid Radwaste Treatment System ensures that this system will be available for use whenever liquid effluents require treatment prior to release to the environment. The requirement that the appropriate portions of this system be used when specified provides assurance that the releases of radioactive materials in liquid effluents will be kept "as low as is reasonably achievable." This specification implements the requirements of 10 CFR 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and the design objective given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the Liquid Radwaste Treatment System were specified as a suitable fraction of the dose design objectives set forth in Section II.A of Appendix I, 10 CFR Part 50 for liquid effluents.~~

~~This specification applies to the release of radioactive materials in liquid effluents from each unit at the site. When shared Radwaste Treatment Systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the Radwaste Treatment System. For determining conformance to LCOs, these allocations from shared Radwaste Treatment Systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.~~ **DELETED**

3/4.11.1.4 LIQUID HOLDUP TANKS

The tanks listed in this specification include all those outdoor radwaste tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System.

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting concentrations would be less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- 1) Identification of a sampling schedule for the critical variables and control points for these variables,
- 2) Identification of the procedures used to measure the values of the critical variables,
- 3) Identification of process sampling points,
- 4) Procedures for the recording and management of data,
- 5) Procedures defining corrective actions for all off-control point chemistry conditions, and
- 6) A procedure identifying: (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- 1) Training of personnel,
- 2) Procedures for sampling and analysis, and
- 3) Provisions for maintenance of sampling and analysis equipment.

e. A program which will ensure the capability to monitor plant variables and systems operating status during and following an accident. This program shall include those instruments provided to indicate system operating status and furnish information regarding the release of radioactive materials (Category 2 and 3 instrumentation as defined in Regulatory Guide 1.97 Revision 2) and provide the following:

- 1) preventive maintenance and periodic surveillance of instrumentation.
- 2) pre-planned operating procedures and back-up instrumentation to be used if one or more monitoring instruments become inoperable.
- 3) administrative procedures for returning inoperable instruments to OPERABLE status as soon as practicable.

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f. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.26a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations ^{at all times} on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ~~10 CFR Part 20, Appendix B, Table II, Column 2, ten times the concentrations stated in 10 CFR 20, Appendix B (to paragraphs 20.1001-20.2401), Table 2, Column 2,~~
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR ~~20.106~~ and with the methodology and parameters in the ODCM, 20.1302
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,
- 7) Limitations ^{at all times} on the ~~dose rate resulting from~~ ^{concentrations of} radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to ~~the doses associated with 10 CFR Part 20, Appendix B, Table II, Column 1, ten times the concentrations stated in 10 CFR Part 20, Appendix B (to paragraphs 20.1001-20.2401), Table 2, Column 1, which corresponds to a dose rate of 500 mrem/year total effective dose equivalent.~~

ADMINISTRATIVE CONTROLS

6.8 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.8.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the Regional Office of the NRC unless otherwise noted.

STARTUP REPORT

6.8.1.1 A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of either unit.

The initial Startup Report shall address each of the startup tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report. Subsequent Startup Reports shall address startup tests that are necessary to demonstrate the acceptability of changes and/or modifications.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS**

6.8.1.2 Annual Reports covering the activities of the plant as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of plant, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions* (e.g., reactor operations and

*This tabulation supplements the requirements of ~~520.407~~ of 10 CFR Part 20.

**A single submittal may be made for Units 1 and 2. The submittal should combine those sections that are common to both units at the plant.

ADMINISTRATIVE CONTROLS

RECORD RETENTION (Continued)

- h. Records of inservice inspections performed pursuant to these Technical Specifications;
- i. Records of quality assurance activities required by the Final Safety Analysis Report;
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- k. Records of meetings of the PRB and the SRB;
- l. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.8 including the date at which the service life commences and associated installation and maintenance records;
- m. Records of secondary water sampling and water quality; and
- n. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

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6.10 RADIATION PROTECTION PROGRAM

6.10.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

6.11 HIGH RADIATION AREA

6.11.1 Pursuant to paragraph ~~20.203(c)(5)~~ ^{20.1601(c)} of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph ~~20.203(e)~~ ^{20.1601}, each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mR/h at 45 cm ~~(18 in.)~~ ^{(30 cm (12 in.))} from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individual is may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates greater than 200 mrem/h but less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or

ADMINISTRATIVE CONTROLS

6.11 HIGH RADIATION AREA (Continued)

- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physics Superintendent in the RWP.

6.11.2 In addition to the requirements of Specification 6.11.1, 30cm (12 in.) areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift Foreman on duty and/or health physics supervision. Doors shall remain locked except during periods of pass by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.12 PROCESS CONTROL PROGRAM (PCP)

6.12.1 The PCP shall be approved by the Commission prior to implementation.

6.12.2 Licensee-initiated changes to the PCP:

- a. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - 1) Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - 2) A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and

ADMINISTRATIVE CONTROLS

6.12 PROCESS CONTROL PROGRAM (PCP) (Continued)

- 3) ~~Documentation of the fact that the change has been reviewed and found acceptable by the PRB.~~
after review and acceptance by the PRB and the
b. Shall become effective upon approval by the General Manager-Nuclear Plant.
Of

6.13 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.13.1 The ODCM shall be approved by the Commission prior to implementation.

6.13.2 Licensee-initiated changes to the ODCM:

Insert 7

- a. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
- 1) Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered, dated and containing the revision number, together with appropriate analyses or evaluations justifying the change(s);
 - 2) A determination that the change will not reduce the accuracy or reliability of dose calculations or Setpoint determinations; and
 - 3) Documentation of the fact that the change has been reviewed and found acceptable by the PRB.
- b. Shall become effective upon approval by the General Manager-Nuclear Plant.
- DELETED

6.14 MAJOR CHANGES TO LIQUID, GASEOUS, AND SOLID RADWASTE TREATMENT SYSTEMS

Not used.

6.14.1 Licensee-initiated major changes to the Radwaste Treatment Systems (liquid, gaseous, and solid):

- a. Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the PRB. The discussion of each change shall contain:
- 1) A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
 - 2) Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
- DELETED

*Licensees may choose to submit the information called for in this Specification as part of the annual FSAR update.

INSERT 7

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.9.30. This documentation shall contain:
- 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR ~~20.106~~, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the PRB and the approval of the General Manager-Nuclear Plant.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Semiannual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

20.1302