

ATTACHMENT A

PROPOSED CHANGE TO APPENDIX A
TECHNICAL SPECIFICATIONS OF
FACILITY OPERATING LICENSE NPF-37

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ADMINISTRATIVE CONTROLS

HIGH RADIATION AREA (Continued)

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., Rad/Chem Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or 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
- 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 in the Radiation Work Permit.

6.12.2 In addition to the requirements of Specification 6.12.1, 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 access 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 (by a more substantial obstacle than rope), conspicuously posted, and a flashing light shall be activated as a warning device.

During emergency situations which involve personnel injury or actions taken to prevent major equipment damage, continuous surveillance and radiation monitoring of the work area by a qualified individual may be substituted for the routine RWP procedure.

ATTACHMENT B

REASONS FOR PROPOSED CHANGE

When entering an area with radiation levels greater than 1000 mR/h, Section 6.12.2 of the Technical Specifications currently requires dose rate levels to be specified on an approved radiation work permit (RWP) without exception. Thus, even in an emergency when personnel may be severely injured or major plant damage may be occurring such as a fire, no response could be initiated until a pre-job radiation survey was performed, documented, and approved on a RWP. An immediate response to the emergency would be inhibited by these requirements and the effectiveness of the response would be diminished. A delayed response could significantly endanger personnel or public safety.

The proposed change would allow for continuous surveillance and radiation monitoring of the work area by qualified individuals in lieu of specifying the dose rate on an approved RWP. This would allow timely response to an emergency involving entry into an area with radiation levels greater than 1000 mR/h and also provide reasonable radiation protection for the emergency workers.

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of Byron Station Unit 1 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the offsite doses that have been predicted for previously evaluated accidents will remain unchanged. Since the proposed change involves an administrative control associated with radiation protection of workers, the probability of any accident previously evaluated will also remain unchanged.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because radiation protection for workers will still be in effect. The proposed change allows for an alternate means of providing radiation protection for workers under emergency conditions.
- 3) Involve a significant reduction in a margin of safety because Commonwealth Edison's administrative radiation exposure limits for workers are not affected by this change.

Based on the preceeding assessment, it is concluded that the proposed amendment meets the standards provided in 10 CFR 50.92 and therefore, does not constitute a significant hazards consideration.