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PG&E Letter HBL-96-027

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

Docket No. 50-133, OL-DPR-7
Humboldt Bay Power Plant Unit 3
License Amendment Request 96-02
Revision of Technical Specifications - Incorporation of 10 CFR 50,
Appendix I Requirements and Relocation of Radiological Effluent and
Radiological Environmental Monitoring Technical Specifications
In Accordance with Generic Letter 89-01

Dear Commissioners and Staff:

Enclosed is License Amendment Request (LAR) 96-02 to amend Facility Operating License No. DPR-7 for Humboldt Bay Power Plant (HBPP) Unit 3. The LAR proposes to incorporate the requirements of 10 CFR 50, Appendix I, into the Radiological Effluent Technical Specifications (RETS), and to relocate the controls and limitations on RETS and radiological environmental monitoring (currently in the Technical Specifications) to the Offsite Dose Calculation Manual (ODCM) and Process Control Program (PCP). Prior to August 28, 1996, the requirements of 10 CFR 50, Appendix I, were not applicable to facilities in the SAFSTOR decommissioning mode, such as HBPP Unit 3. Based on regulation revisions that became effective on August 28, 1996, the Appendix I requirements for control of effluents are now applicable to HBPP Unit 3.

LAR 96-02 is proposed in accordance with the guidance provided in Generic Letter 78-39 (untitled) and Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program." This LAR conforms to the guidance contained in NUREG-0473, "Radiological Effluent Technical Specifications for BWR's," and Generic Letter 89-01 as much as practicable for a plant in the SAFSTOR decommissioning mode.

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LAR 96-02 proposes to place programmatic controls for radiological effluents and radiological environmental monitoring under the Administrative Controls section of the Technical Specifications. These controls are consistent with the guidance provided by the NRC in NUREG-0473 and Generic Letter 89-01, as applicable, to the HBPP SAFSTOR Decommissioning Plan and the HBPP Final Environmental Statement (NUREG-1166) issued by the NRC.

The programmatic controls will incorporate new dose limitations that do not exist in the current Technical Specifications and that are considerably lower than the current limits on instantaneous concentration, which are based on 500 mrem per year. These new limitations include:

- (1) a limitation on dose from liquid releases to Humboldt Bay of less than 3 mrem per year to the total body and less than 10 mrem per year to any organ
- (2) a limitation on air dose from noble gases released beyond the site boundary of less than or equal to 10 mrad per year from gamma radiation and less than or equal to 20 mrad per year from beta radiation
- (3) a limitation on dose from airborne releases of tritium and radioactive materials in particulate form in gases released beyond the site boundary of less than or equal to 15 mrem per year to any organ
- (4) a limitation on the annual dose or dose commitment of less than or equal to 25 mrem to the total body or any organ due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR 190

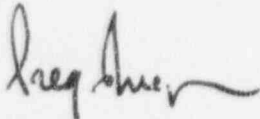
Attachment A provides a description of the changes, justification for the changes, safety evaluation, no significant hazards evaluation, no significant hazards determination, and an environmental evaluation. Attachment B is a copy of the current Technical Specifications with the proposed changes annotated. Attachment C is an implementation matrix showing the disposition of the Generic Letter 89-01 guidance. Attachment D is a copy of the revised ODCM, including the Radiological Environmental Monitoring Program that contains the relocated RETS and the PCP to implement LAR 96-02.

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The revised ODCM (including the PCP) has been approved by the HBPP Unit 3 Plant Staff Review Committee and the Plant Manager, and will be ready for implementation within 30 days of NRC approval of LAR 96-02.

LAR 96-02 replaces LAR 94-02, which was submitted to the NRC in PG&E Letter HBL-94-071, dated November 23, 1994. Accordingly, PG&E hereby withdraws LAR 94-02.

Sincerely,



Gregory M. Rueger

cc: Edgar Bailey, DHS
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S. Bajwa
L. J. Callan
Kenneth E. Perkins (w/o enc)
Humboldt Distribution

Enclosure

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