

ENCLOSURE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

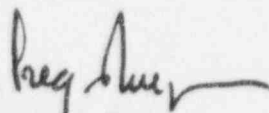
In the Matter of PACIFIC GAS AND ELECTRIC COMPANY Humboldt Bay Power Plant Unit 3) Docket No. 50-133) Facility Operating License) No. DPR-7)) License Amendment Request No. 96-02)
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Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company hereby applies to amend its Humboldt Bay Power Plant Unit 3 Facility Operating License No. DPR-7.

The proposed changes to the License would allow PG&E 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 and the Process Control Program. Information on the proposed changes is provided in Attachments A through D.

The changes have been reviewed and do not involve a significant hazards consideration as defined in 10 CFR 50.92 or an unreviewed environmental question. Further, there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changes.

Sincerely,


Gregory M. Rueger

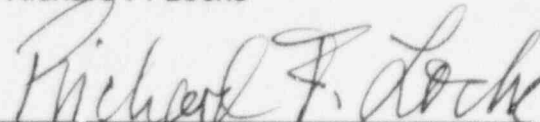
Subscribed and sworn to before me
this 9th day of December 1996

(noted)
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Notary Public

Attorneys for Pacific Gas
and Electric Company
Bruce R. Worthington
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ATTACHMENT A

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

A. BACKGROUND

Humboldt Bay Power Plant (HBPP) Unit 3 is a 65 MWe boiling water reactor power plant owned by PG&E. Unit 3 achieved initial criticality on February 16, 1963, and began commercial operation in August 1963. The reactor was shutdown on July 2, 1976, for annual refueling and to perform seismic modification work. Seismic and geologic studies and other modifications and repairs were in progress. In December 1980, it became apparent that the cost of completing required backfits and studies made it uneconomical to restart the unit. Work was suspended at that time awaiting further guidance regarding backfitting requirements. On June 27, 1983, PG&E announced the decision to decommission Unit 3. Upon NRC issuance of a possession-only license in July 1988, the project to place Unit 3 in the SAFSTOR mode was completed.

The Technical Specifications currently contain programmatic controls and procedural details for radiological effluents and the Radiological Environmental Monitoring Program (REMP) integrated within various sections of the Technical Specifications. These controls on radiological effluents are currently based on limiting the instantaneous concentration of radioactive materials released to Humboldt Bay (for liquids) or beyond the site boundary (for airborne releases) in accordance with 10 CFR 20.106 to concentrations that do not exceed the maximum permissible concentrations (MPCs) specified in Appendix B, Table II of 10 CFR 20.1 - 20.602. These MPC concentrations are specific values that are based on an annual dose of 500 mrem to an individual member of the public.

In a letter from B. Grimes, Assistant Director for Engineering and Projects, dated July 11, 1978, to all boiling water reactor licensees and followed later by Generic Letter (GL) 78-39, the NRC requested that a license amendment request (LAR) application be submitted to incorporate the requirements of 10 CFR Part 50, Appendix I, into the facility Technical Specifications. These requirements were to be incorporated into Radiological Effluent Technical Specifications (RETS) following the guidance of NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," and NUREG-0473, "Radiological Effluent Technical Specifications for BWR's." Since Unit 3 had been shut down prior to receipt of this letter and the date for return to operation had not been determined,

PG&E submitted a written reply to the NRC dated November 5, 1979, stating that PG&E planned to respond to this issue after resolution of the seismic issues. Consequently, the requested LAR was not submitted and the limitations on radiological effluents remained based on the MPC concentration limits and remained integrated within various sections of the Technical Specifications.

Since the requirements contained in 10 CFR 50.36a to incorporate Appendix I requirements into RETS applied only to operating power reactors, the requirements were never incorporated into the RETS after Unit 3 entered the SAFSTOR decommissioning mode. However, on July 29, 1996, the NRC published a Federal Register Notice containing decommissioning regulation amendments that became effective August 28, 1996. Contained within these amendments were revisions to 10 CFR 50.36a and 10 CFR 50, Appendix I, making the Appendix I requirements applicable to decommissioning activities as well as operating nuclear power reactors.

The Appendix I requirements contain limitations to maintain dose to individual members of the public much lower than the current limitation of 500 mrem per year based on the instantaneous MPC concentration limits. These new requirements 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 airborne 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

Although it was not a requirement in the past, PG&E has maintained dose to individual members of the public much lower than the Appendix I limitations. For example, the maximum dose from liquid releases to Humboldt Bay during 1995 was 0.005 mrem per year to the total body and 0.008 mrem per year to any organ. During this same period, the maximum gamma and beta radiation doses from airborne noble gases released beyond the site boundary were less than 0.005 mrem per year, which is the level at which the releases could be detected. The maximum dose from tritium and radioactive materials in particulate form in gases released beyond the site boundary was less than 0.01 mrem per year.

On January 31, 1989, the NRC issued GL 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," to all power reactor licensees and applicants. This action was taken following NRC staff examination of the contents of the RETS in relation to the "Commission's Interim Policy Statement on Technical Specification Improvements" which existed at that time.

The staff determined in GL 89-01 that programmatic controls could be implemented in the Administrative Controls section of the Technical Specifications to satisfy regulatory requirements for RETS. They also found that the procedural details of the existing Technical Specifications on radioactive effluents and radiological environmental monitoring could be relocated to the Offsite Dose Calculation Manual (ODCM) and the procedural details of the current Technical Specifications for solid radioactive waste could be relocated to the Process Control Program (PCP).

PG&E originally elected not to take action regarding GL 89-01 since the existing Technical Specifications had never been revised to incorporate Appendix I requirements into RETS. However, PG&E has now decided to submit this LAR based on guidance in GL 89-01 by revising the RETS in accordance with NUREG-0473 to incorporate Appendix I requirements, thus implementing the revised 10 CFR 50.36a requirements, and moving the revised RETS and the existing Technical Specification controls and limitations on radiological environmental monitoring to the ODCM.

Implementation of GL 89-01 simplifies the RETS, meets the regulatory requirements for radioactive effluents and radiological environmental monitoring, and results in improvement of the Technical Specifications consistent with the goals of the Policy Statement. GL 89-01 provides guidance for the preparation of a license amendment change request.

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

B. DESCRIPTION OF AMENDMENT REQUEST

This LAR proposes to revise the HBPP Unit 3 Technical Specifications to implement the revised requirements of 10 CFR 50.36a by incorporating the requirements of 10 CFR 50, Appendix I, related to radiological effluents into the RETS. In addition, this LAR proposes to implement the guidance of GL 89-01 as applicable to SAFSTOR decommissioning by establishing programmatic controls for RETS and REMP in the Administrative Controls section of the Technical Specifications and relocating the procedural details of RETS and REMP to the ODCM or to the PCP.

This LAR also implements the 'new' 10 CFR 20 (revised 1/1/94) effluent limits and corrects other existing Technical Specification references to 10 CFR 20.

Specifically, this change (1) incorporates programmatic controls in the Administrative Controls section of the Technical Specifications that satisfy the requirements of 10 CFR 20.1302, 40 CFR Part 190, and revised 10 CFR 50.36a and 10 CFR 50, Appendix I; (2) relocates the current specifications involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the Technical Specifications to the ODCM; (3) modifies the reporting requirements associated with item (2); (4) modifies the administrative controls for changes to the ODCM and PCP; (5) adds record retention requirements for changes to the ODCM and PCP; and (6) updates the definitions of the ODCM and PCP consistent with these changes.

The ODCM is a document that contains the new RETS developed following the guidance of NUREG-0473 and the calculational methodologies and parameters used to implement the requirements of the RETS.

The PCP, contained within the ODCM, is a document that specifies the methodologies used to determine that solid radioactive wastes will conform to applicable shipping and burial ground requirements.

The proposed Technical Specification changes are as follows:

1. Page ii, "CONTENTS"

Add new definition heading "8. Process Control Program" and renumber subsequent definition headings.

2. Page iii

Delete headings V.A.1, V.A.2, V.A.4, V.A.6, V.B.1, V.B.2, V.B.4, V.B.6, VI.A, VI.A.1, VI.A.2, and V.B.3.

3. Page iv

Insert new headings "F. Radioactive Effluent Controls Program," and "G. Radiological Environmental Monitoring Program," and renumber subsequent headings. Insert new headings "N. Process Control Program Changes" and "O. Offsite Dose Calculation Manual Changes."

4. Page v

Delete Table V-1, Figure V-1, Figure V-2, and Figure V-3.

5. Page I-2, Section B.4, "Offsite Dose Calculation Manual"

Replace with Insert 1 to revise the definition reflecting the change in scope of the ODCM in accordance with GL 89-01

6. Page I-3, Section B.8, "SAFSTOR"

Insert a new definition "8. Process Control Program" (Insert 2) that reflects the change in scope of the PCP in accordance with GL 89-01 and renumber the subsequent definitions.

7. Page I-4

Renumber the definitions.

8. Page V-1, Section V.A.1, "Stack Gas Monitoring System"

Delete this section. Programmatic controls are included in the new Section VII.F.1. Existing specification procedural details are relocated to the ODCM as appropriate.

9. Pages V-1 and V-2, Section V.A.2, "Process Water Monitor"

Delete this section. Programmatic controls are included in the new Section VII.F.1. Existing specification procedural details are relocated to the ODCM as appropriate.

10. Page V-3, Section V.A.4, "Offsite Environmental Monitoring Stations"

Delete this section. Programmatic controls are included in the new Section VII.G.1. Existing specification procedural details are relocated to the ODCM as appropriate.

11. Page V-3, Section V.A.6, "Onsite Environmental Monitoring Stations"

Delete this section. Programmatic controls are included in the new Section VII.G.1. Existing specification procedural details are relocated to the ODCM as appropriate.

12. Page V-4, Sections V.B.1.a and b, "Stack Gas Monitoring System"

Delete these sections. Programmatic controls are included in the new Section VII.F.1. Existing specification procedural details are relocated to the ODCM as appropriate.

13. Page V-5, Sections V.B.1.c and d, "Stack Gas Monitoring System"

Delete these sections. Existing specification procedural details are relocated to the ODCM as appropriate.

14. Page V-5, Sections V.B.2.a and b, "Process Water Monitor"

Delete these sections. Programmatic controls are included in the new Section VII.F.1. Existing specification procedural details are relocated to the ODCM as appropriate.

15. Page V-7, Section V.B.4, "Offsite Environmental Monitoring Stations"

Delete this section. Programmatic controls are included in the new Section VII.G.1. Existing specification procedural details are relocated to the ODCM as appropriate.

16. Pages V-8 and V-9, Sections V.B.6.a, b, and c, "Onsite Environmental Monitoring Stations"

Delete this section. Programmatic controls are included in the new Section VII.G.1. Existing specification procedural details are relocated to the ODCM as appropriate.

17. Page V-11, Table V-1, "Operating Limits for Groundwater Activity During SAFSTOR"

Delete this table. Programmatic controls are included in the new Section VII.G.1. Existing specification procedural details are relocated to the ODCM as appropriate.

18. Page V-12, Figure V-1, "Dosimeter Locations for Stations near HBPP"

Delete this figure. It has been relocated to the ODCM.

19. Page V-13, Figure V-2, "Humboldt Bay Onsite Dosimeter Stations"

Delete this figure. It has been relocated to the ODCM.

20. Page V-14, Figure V-3, "HBPP Groundwater Monitoring Wells"

Delete this figure. It has been relocated to the ODCM.

21. Pages VI-1 and 2, Section VI.A.1, "Liquid Radioactive Waste System"

Delete this section. Programmatic controls are included in the new Section VII.F.6. Existing specification procedural details are relocated to the ODCM as appropriate.

22. Page VI-3, Section VI.A.2, "Solid Radioactive Waste System"

Delete this section. Existing specification procedural details are relocated to the ODCM or PCP as appropriate.

23. Pages VI-3 and 4, Sections VI.B.1.a, b, c, d, and e, "Liquid Radioactive Waste System"

Delete these sections. Programmatic controls are included in the new Section VII.F.6. Existing specification procedural details are relocated to the ODCM as appropriate.

24. Page VI-4, Sections VI.B.2. b and c, "Solid Radioactive Waste System"

Delete these sections. Programmatic controls are included in the new Section VII.H. Existing specification procedural details are relocated to the PCP.

25. Page VI-5, Section VI.B.3, "Gaseous Effluents"

Delete this section. Programmatic controls are included in the new Sections VII.F.7 & 8. Existing specification procedural details are relocated to the ODCM.

26. Page VII-21, Section VII.E.1.i, "Procedures"

Insert new section "j. Process Control Program" (Insert 3) following this section.

27. Page VII-22, Section VII.F, "Site Emergency Plan"

Insert new sections "F. Radioactive Effluent Controls Program" (Insert 4) and "G. Radiological Environmental Monitoring Program" (Insert 5) prior to this section and renumber the subsequent sections. These sections establish the programmatic controls for radioactive effluent control and radiological environmental monitoring in accordance with GL 89-01.

28. Page VII-23, Section VII.H.1, "Annual Report"

Replace with Insert 6 to revise the section in accordance with GL 89-01 and renumber the section to VII.J.1. The specification is simplified and the existing reporting details are relocated to the ODCM.

29. Page VII-24, Section VII.H.3, "Annual Effluent Release Report"

Replace with Insert 7 to revise the section in accordance with GL 89-01. The specification is simplified and the existing reporting details are relocated to the ODCM.

30. Page VII-25, Section I, "Record Retention"

Renumber Section I to become Section K.

31. Page VII-27, Section J, "Radiation Protection Program"

Insert the new Section VII.K.2.k (Insert 8) prior to this section. This new section establishes record retention requirements for reviews performed for changes made to the ODCM and the PCP in accordance with GL 89-01.

32. Page VII-27, Section VII.K.1, "Less Than or Equal to 1000 mr/hr"

Revise reference to 20.203(c)(5) to 20.1601(c) to reflect the 'new' 10 CFR 20 and renumber the section to VII.M.1.

33. Page VII-28, Section VII.K.1, "Less Than or Equal to 1000 mr/hr"

Revise reference to 20.203(c)(2) to 20.1601(a) and less than 1000 mr/hr at 45 cm (18 in.) to less than 1000 mr/hr at 30 cm (12 in.) to reflect the 'new' 10 CFR 20.

34. Page VII-29, Section VII.K.2, "Greater than 1000 mr/hr"

Revise reference to Specification VII.K.1 to Specification VII.M.1 to reflect renumbering. Revise reference to greater 1000 mr/hr at 45 cm (18 in.) to greater than 1000 mr/hr at 30 cm (12 in.) to reflect the 'new' 10 CFR 20.

35. Page VII-29

Insert new sections "VII.N. Process Control Program Changes" (Insert 9) and "VII.O. Offsite Dose Calculation Manual Changes" (Insert 10) after the existing Section VII.K.2, "Greater Than 1000 mr/hr." These new sections establish

administrative controls in accordance with GL 89-01 for changes made to the ODCM or PCP.

These proposed changes are noted in the marked-up copy of the applicable Technical Specification pages provided in Attachment B.

C. JUSTIFICATION

This LAR implements the requirements in revised 10 CFR 50.36a, which became effective August 28, 1996. These revised requirements make the 10 CFR 50, Appendix I, requirements for control of effluents applicable to all decommissioning activities as well as to operating nuclear power plants. The Appendix I requirements have been incorporated into the existing Technical Specifications following the guidance of NUREG-0473 as applicable to a power reactor that has been shut down for over 20 years and is currently in a SAFSTOR decommissioning mode. The LAR also implements the 'new' 10 CFR 20 (revised 1/1/94) effluent limits and corrects other existing Technical Specification references to the 'new' 10 CFR 20.

This LAR also implements the guidance provided in GL 89-01 as applicable to a plant in the SAFSTOR decommissioning mode. Prior to issuance of GL 89-01, the NRC staff examined the contents of the RETS in relation to the Commission's (then existing) Interim Policy Statement on Technical Specification Improvements. Based on this examination, the staff determined that programmatic controls can be implemented in the Administrative Controls section of the Technical Specifications to satisfy existing regulatory requirements for RETS. At the same time, the procedural details of the current Technical Specifications on radioactive effluents and radiological environmental monitoring can be relocated to the ODCM. Likewise, the procedural details of the current Technical Specifications on solid radioactive wastes can be relocated to the PCP. These actions simplify the RETS, meet the regulatory requirements for radioactive effluents and radiological environmental monitoring, and are provided as a line-item improvement of the Technical Specifications, consistent with the goals of the Interim Policy Statement.

In taking these actions, it was not the staff's intent to reduce the level of radiological effluent control. Rather, this LAR will provide programmatic controls for RETS consistent with regulatory requirements and allow relocation of the procedural details of current RETS to the ODCM or PCP. Therefore, future changes to these procedural details will be controlled by the controls for changes to the ODCM or PCP that are proposed for addition to the Administrative Controls section of the Technical Specifications. These procedural details are not required to be included in Technical Specifications by 10 CFR 50.36a.

In the new Technical Specification VII.F.2, PG&E is requesting to establish programmatic limitations on the instantaneous concentrations of radioactive material

released in liquid effluents to Humboldt Bay conforming to ten times the effluent concentration limits (ECLs) of 10 CFR 20, Appendix B, Table 2, Column 2. The basic requirements for Technical Specifications concerning effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent Technical Specifications (which have incorporated the requirements of Appendix I to 10 CFR 50) will keep average annual releases of radioactive material in effluents and their resultant committed effective dose equivalents at small percentages of the dose limits for individual members of the public specified in 10 CFR 20.1301. These 10 CFR 50.36a 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 dose limits specified in 10 CFR 20.1301. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be executed to keep levels of radioactive materials as low as is reasonably achievable (ALARA) within the numerical limits set forth in 10 CFR 50, Appendix I.

The current Technical Specification limit for instantaneous concentrations is based on the limits specified in the 'old' 10 CFR 20.106, which references Appendix B, Table II MPCs. These referenced concentrations are specific values that relate to an annual dose to an individual member of the public of 500 mrem. As stated in the introduction to Appendix B of the 'new' 10 CFR 20, the liquid ECLs provided in Appendix B, Table 2, Column 2, are based on an annual dose of 50 mrem. The use of an instantaneous concentration limit equal to ten times the new ECLs will allow the same degree of operational flexibility that is allowed by the current Technical Specifications, while incorporation of the new Appendix I annual dose limit of 3 mrem into the Technical Specifications will assure compliance with the new ECL equivalent annual dose of 50 mrem.

Operational history at HBPP Unit 3 during SAFSTOR decommissioning has demonstrated that the use of instantaneous concentration values associated with the old 10 CFR 20.106 MPCs as Technical Specification limits has resulted in calculated maximum doses to an individual member of the public that are small percentages of the limits of 10 CFR 50, Appendix I. For 1995 the calculated dose was an annual average of 0.02 mrem for the total body, well below the 10 CFR 50, Appendix I limit of 3 mrem. Therefore, the use of instantaneous concentration values that correspond to an annual dose of 500 mrem (ten times the ECLs stated in the new 10 CFR 20, Appendix B, Table 2, Column 2) will not preclude our ability to operate within the limits of 10 CFR 50, Appendix I, and the limits of 40 CFR 190.

Compliance with the limits of new 10 CFR 20.1301 will be demonstrated by maintaining effluent releases within the limits of 10 CFR 50, Appendix I; the limits of 40 CFR 190; and the estimated baseline radioactive effluent releases established in the SAFSTOR Environmental Report and referenced in the HBPP Final Environmental Statement (NUREG-1166).

D. SAFETY EVALUATION

This LAR establishes 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 GL 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 established for REMP do not change the controls for REMP that currently exist in the Technical Specifications. The programmatic controls established for RETS will incorporate new, more restrictive, limitations for dose to individual members of the public that do not currently exist in the Technical Specifications including:

- (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 airborne 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 Part 190

These new limitations are much more restrictive for dose to individual members of the public than the current limitations for RETS based on instantaneous concentration which equates to 500 mrem per year.

Based on the above evaluation, PG&E believes there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed Technical Specification changes.

E. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant hazards considerations involved with the proposed amendment, focusing on the three standards set forth in 10 CFR 50.92(c) as quoted below:

The Commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

Involve a significant increase in the probability or consequences of an accident previously evaluated; or

Create the possibility of a new or different kind of accident from any accident previously evaluated; or

Involve a significant reduction in a margin of safety.

The following evaluation is provided for the no significant hazards consideration standards:

1. *Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?*

Operation of the facility in accordance with the proposed amendment would not involve any increase in the probability or consequences of an accident previously evaluated. This change places new requirements in the Administrative Controls section of the Technical Specifications to establish programs for the control of radiological effluents and the conduct of radiological environmental monitoring in the ODCM. The new Administrative Control requirements for radiological effluents to be placed in the ODCM incorporate 10 CFR 50, Appendix I, limitations on dose to individual members of the public that are much more restrictive than the current Technical Specification limitations. The proposed changes do not involve modifications to existing plant equipment, the addition of new equipment, or operation of the plant in a different manner than previously evaluated.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?*

Operation of the facility in accordance with the proposed amendment will not create any new or different kind of accident from any accident previously evaluated. As stated above, new programmatic controls on radiological effluents and radiological environmental monitoring are established in the Administrative Controls section of the Technical Specifications. Additionally, this change is administrative in nature; procedural details for radiological effluents

and radiological environmental monitoring are being relocated to the ODCM and PCP consistent with the guidance provided in GL 89-01. The proposed changes do not involve alterations to plant operating philosophy or methods, or in changes to installed plant systems, structures or components.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *Does the change involve a significant reduction in a margin of safety?*

Operation of the facility in accordance with the proposed amendment would not involve any reduction in the margin of safety. These changes do not involve a significant reduction in the margin of safety. The changes will provide control over radioactive effluent releases, solid waste management, and radiological environmental monitoring activities. Also, these changes will increase the margin of safety for members of the public by imposing additional controls to ensure that dose to members of the public resulting from radioactive effluent releases will be maintained ALARA.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above safety evaluation, PG&E concludes that the changes proposed by this LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

G. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in baseline individual or cumulative occupational or public radiation exposure evaluated in the HBPP Final Environmental Statement.

Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.