ENCLOSURE I

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT*

6.9.1.8 Routine radioactive effluent release reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

6.9.1.9 The radioactive effluent release reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

The radioactive effluent release report to be submitted 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing of wind speed, wind direction, and atmospheric stability, and precipitation (if measured) on magnetic tape, or in the form of joint frequency distributions of wind speed, wind direction and atmospheric stability.** This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to members of the public due to their activities inside the site boundary (Figures 5.1-3 and 5.1-4) during the report period. All assumptions used in making these assessments (i.e., specific activity, exposure time and location) shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents (as determined by sampling frequency and measurement) shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

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* A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

** In lieu of submission with the first half year Radioactive Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC on request.

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT*

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** In lieu of submission with the first half year Radioactive Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC on request.

The radioactive effluent release report to be submitted 60 days after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed member of the public from reactor releases and other nearby uranium fuel cycle sources (including doses from primary effluent pathways and direct radiation) for the previous calendar year to show conformance with 40 CFR 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in the OFFSITE DOSE Calculation Manual (ODCM).

The radioactive effluent release reports shall include the following information for each type of solid waste shipped offsite during the report period:

a. Container volume,

b. Total curie quantity (specify whether determined by measurement or estimate),

c. Principal radionuclides (specify whether determined by measurement or estimate),

d. Type of waste (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),

e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and

f. Solidification agent (e.g., cement, urea formaldehyde).

The radioactive release reports shall include unplanned releases from the site to unrestricted areas of radioactive material in gaseous and liquid effluents on a quarterly basis.

The radioactive release reports shall include any changes to the PROCESS CONTROL PROGRAM (PCP), to the OFFSITE DOSE CALCULATION MANUAL (ODCM), or major changes to the radioactive waste treatment systems during the reporting period.

MONTHLY OPERATING REPORT

6.9.1.10 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to pressurizer safety valves, shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C., 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.

Any changes to the OFFSITE DOSE CALCULATION MANUAL shall be submitted with the Monthly Operating Report within 90 days of the change(s) effective date. In addition, a report of any major changes to the radioactive waste treatment systems shall be submitted with the Monthly Operating Report for the period in which the change was made effective.

The radioactive effluent release report to be submitted 60 days after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed member of the public from reactor releases and other nearby uranium fuel cycle sources (including doses from primary effluent pathways and direct radiation) for the previous calendar year to show conformance with 40 CFR 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in the OFFSITE DOSE Calculation Manual (ODCM).

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b. Total curie quantity (specify whether determined by measurement or estimate),

c. Principal radionuclides (specify whether determined by measurement or estimate),

d. Type of waste (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),

e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and

f. Solidification agent (e.g., cement, urea formaldehyde).

The radioactive release reports shall include unplanned releases from the site to unrestricted areas of radioactive material in gaseous and liquid effluents on a quarterly basis.

The radioactive release reports shall include any changes to the PROCESS CONTROL PROGRAM (PCP), to the OFFSITE DOSE CALCULATION MANUAL (ODCM), or major changes to the radioactive waste treatment systems during the reporting period.

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Any changes to the OFFSITE DOSE CALCULATION MANUAL shall be submitted with the Monthly Operating Report within 90 days of the change(s) effective date. In addition, a report of any major changes to the radioactive waste treatment systems shall be submitted with the Monthly Operating Report for the period in which the change was made effective.

6.13 PROCESS CONTROL PROGRAM (PCP)

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

6.13.2 Licensee-initiated changes to the PCP:

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the changes(s) was made. This submittal shall contain:

   a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;

   b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and

   c. Documentation of the fact that the change has been reviewed and found acceptable pursuant to 6.5.2.9.

2. Shall become effective upon review and approval pursuant to 6.5.2.9.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

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

6.14.2 Licensee-initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Semiannual Operating Report within 90 days of the date the change(s) was made effective. This submittal shall contain:

   a. 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 number identified and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);

   b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and

   c. Documentation of the fact that the change has been reviewed and found acceptable pursuant to 6.5.2.9.

2. Shall become effective upon review and approval pursuant to 6.5.2.9.

The PCP shall be submitted and approved prior to shipment of "wet" solid radioactive waste.

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   a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;

   b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and

   c. Documentation of the fact that the change has been reviewed and found acceptable pursuant to 6.5.2.9.

2. Shall become effective upon review and approval pursuant to 6.5.2.9.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

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

6.14.2 Licensee-initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Semiannual Operating Report within 90 days of the date the change(s) was made effective. This submittal shall contain:

   a. 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 and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);

   b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and

   c. Documentation of the fact that the change has been reviewed and found acceptable pursuant to 6.5.2.9.

2. Shall become effective upon review and approval pursuant to 6.5.2.9.

The PCP shall be submitted and approved prior to shipment of "wet" solid radioactive waste.

6.15 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS* (Liquid, Gaseous and Solid)

6.15.1 Licensee-initiated major changes to the radioactive waste treatment systems (liquid, gaseous and solid):

1. Shall be reported to the Commission in the Semiannual Operating Report for the period in which the change(s) was made effective pursuant to 6.5.2.9. The discussion of each change shall contain:

   a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;

   b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;

   c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;

   d. An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the licensee application and amendments thereto;

   e. An evaluation of the change which shows the expected maximum exposures to an individual in the unrestricted area and to the general population that differ from those previously estimated in the licensee application and amendments thereto;

   f. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;

   g. An estimate of the exposure to plant operating personnel as a result of the change; and

   h. Documentation of the fact that the change was reviewed and found acceptable pursuant to 6.5.2.9.

2. Shall become effective upon review and approval pursuant to 6.5.2.9.

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

6.15 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS* (Liquid, Gaseous and Solid)

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1. Shall be reported to the Commission in the Semiannual Operating Report for the period in which the change(s) was made effective pursuant to 6.5.2.9. The discussion of each change shall contain:

   a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;

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   e. An evaluation of the change which shows the expected maximum exposures to an individual in the unrestricted area and to the general population that differ from those previously estimated in the licensee application and amendments thereto;

   f. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;

   g. An estimate of the exposure to plant operating personnel as a result of the change; and

   h. Documentation of the fact that the change was reviewed and found acceptable pursuant to 6.5.2.9.

2. Shall become effective upon review and approval pursuant to 6.5.2.9.

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

PLANT SYSTEMS

SPRAY AND/OR SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.8.2 The spray and/or sprinkler systems listed in Table 3.7-5 shall be OPERABLE.

APPLICABILITY: Whenever equipment protected by the spray/sprinkler system is required to be OPERABLE.

ACTION:

a. With one or more of the above required spray and/or sprinkler systems inoperable, within 1 hour establish a continuous fire watch with backup fire suppression equipment for those areas outside containment in which redundant systems or components could be damaged; for other areas outside containment, establish an hourly fire watch patrol.

b. With one or more of the above required spray and/or sprinkler systems inside containment inoperable, restore the system to OPERABLE status within 24 hours or
prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.8.2 Each of the above required spray and/or sprinkler systems shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) outside of containment in the flow path is in its correct position.

b. At least once per 31 days during each COLD SHUTDOWN or REFUELING by verifying that each valve (manual, power operated or automatic) inside containment in the flow path is in its correct position,

c. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.

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PLANT SYSTEMS

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prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.8.2 Each of the above required spray and/or sprinkler systems shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve (manual, power-operated or automatic) outside of containment in the flow path is in its correct position.

b. At least once per 31 days during each COLD SHUTDOWN or REFUELING by verifying that each valve (manual, power-operated or automatic) inside containment in the flow path is in its correct position,

c. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.

d. At least once per 18 months:

1. By performing a system functional test which includes simulated automatic actuation of the system, and:

a) Verifying that the automatic valves in the flow path actuate to their correct positions on a test signal, and

b) Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel.

2. By a visual inspection of the dry pipe spray and wet pipe spray sprinkler headers to verify their integrity, and

SURVEILLANCE REQUIREMENTS (Continued)

13. Verifying that the automatic load sequence timer is OPERABLE with the interval between each load block within ± 10% of its design interval.

14. Verifying that lockout relay K23 prevents diesel generator starting when the diesel generator is actuated.

e. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting the diesel generators simultaneously, during shutdown, and verifying that the diesel generators accelerate to at least 900 rpm in less than or equal to 10 seconds.

f. At least once per 10 years by:

1. Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite solution or the equivalent, and

2. Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code at a test pressure equal to 110 percent of the system design pressure.

4.8.1.1.3 Reports - All diesel generator failures, valid or nonvalid, shall be reported in a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days. Reports of diesel generator failures shall include the information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977. If the number of failures in the last 100 valid tests (on a per nuclear unit basis) is greater than or equal to 7, the report shall be supplemented to include the additional information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977.

SURVEILLANCE REQUIREMENTS (Continued)

13. Verifying that the automatic load sequence timer is OPERABLE with the interval between each load block within ± 10% of its design interval.

14. Verifying that lockout relay K23 prevents diesel generator starting when the diesel generator is actuated.

e. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting the diesel generators simultaneously, during shutdown, and verifying that the diesel generators accelerate to at least 900 rpm in less than or equal to 10 seconds.

f. At least once per 10 years by:

1. Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite solution or the equivalent, and

2. Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code at a test pressure equal to 110 percent of the system design pressure.

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RADIOACTIVE EFFLUENTS

DOSE

LIMITING CONDITION FOR OPERATION

3.11.1.2 The dose or dose commitment to an individual from radioactive materials in liquid effluents released, from each reactor unit, from the site (see Figure 5.1-4) shall be limited:

a. During any calendar quarter to less than or equal to 1.5 mrem to the total body and to less than or equal to 5 mrem to any organ, and

b. During any calendar year to less than or equal to 3 mrem to the total body and to less than or equal to 10 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions taken to reduce the releases and the proposed actions to be taken to assure that subsequent releases will be in compliance with Specification 3.11.1.2

b. The provisions of specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.2 Dose Calculations. Cumulative dose contributions from liquid effluents shall be determined in accordance with the ODCM at least once per 31 days.

RADIOACTIVE EFFLUENTS

DOSE

LIMITING CONDITION FOR OPERATION

3.11.1.2 The dose or dose commitment to an individual from radioactive materials in liquid effluents released, from each reactor unit, from the site (see Figure 5.1-4) shall be limited:

a. During any calendar quarter to less than or equal to 1.5 mrem to the total body and to less than or equal to 5 mrem to any organ, and

b. During any calendar year to less than or equal to 3 mrem to the total body and to less than or equal to 10 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions taken to reduce the releases and the proposed actions to be taken to assure that subsequent releases will be in compliance with Specification 3.11.1.2

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.2 Dose Calculations. Cumulative dose contributions from liquid effluents shall be determined in accordance with the ODCM at least once per 31 days.

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RADIOACTIVE EFFLUENTS

LIQUID WASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.1.3 The liquid radwaste treatment system shall be OPERABLE. The appropriate portions of the system shall be used to reduce the radioactive materials in liquid wastes prior to their discharge when the projected doses due to the liquid effluent from the site (see Figure 5.1-4) when averaged over 31 days, would exceed 0.06 mrem to the total body or 0.2 mrem to any organ.*

APPLICABILITY: At all times.

ACTION:

a. With the liquid radwaste treatment system inoperable for more than 31 days or with radioactive liquid waste being discharged without treatment and in excess of the above limits , prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report which includes the following information:

   1. Identification of the inoperable equipment or subsystems and the reason for inoperability,

   2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and

   3. Summary description of action(s) taken to prevent a recurrence.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.3.1 Doses due to liquid releases shall be projected at least once per 31 days, in accordance with the ODCM.

4.11.1.3.2 The liquid radwaste treatment system shall be demonstrated OPERABLE by operating the liquid radwaste treatment system equipment for at least 15 minutes at least once per 92 days unless the liquid radwaste system has been utilized to process radioactive liquid effluents during the previous 92 days.

*Per reactor unit

RADIOACTIVE EFFLUENTS

LIQUID WASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.1.3 The liquid radwaste treatment system shall be OPERABLE. The appropriate portions of the system shall be used to reduce the radioactive materials in liquid wastes prior to their discharge when the projected doses due to the liquid effluent from the site (see Figure 5.1-4) when averaged over 31 days, would exceed 0.06 mrem to the total body or 0.2 mrem to any organ.*

APPLICABILITY: At all times.

ACTION:

a. With the liquid radwaste treatment system inoperable for more than 31 days or with radioactive liquid waste being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report which includes the following information:

   1. Identification of the inoperable equipment or subsystems and the reason for inoperability,

   2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and

   3. Summary description of action(s) taken to prevent a recurrence.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.3.1 Doses due to liquid releases shall be projected at least once per 31 days, in accordance with the ODCM.

4.11.1.3.2 The liquid radwaste treatment system shall be demonstrated OPERABLE by operating the liquid radwaste treatment system equipment for at least 15 minutes at least once per 92 days unless the liquid radwaste system has been utilized to process radioactive liquid effluents during the previous 92 days.

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*Per reactor unit

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RADIOACTIVE EFFLUENTS

DOSE - NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.2 The air dose due to noble gases released in gaseous effluents, from each reactor unit, from the site (see Figure 5.1-3) shall be limited to the following:

a. During any calendar quarter: Less than or equal to 5 mrad for gamma radiation and less than or equal to 10 mrad for beta radiation and,

b. During any calendar year: Less than or equal to 10 mrad for gamma radiation and less than or equal to 20 mrad for beta radiation.

APPLICABILITY: At all times.

ACTION

a. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions taken to reduce releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with Specification 3.11.2.2.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.2 Dose Calculations Cumulative dose contributions for the current calendar quarter and current calendar year shall be determined in accordance with the ODCM at least once per 31 days.

RADIOACTIVE EFFLUENTS

DOSE - NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.2 The air dose due to noble gases released in gaseous effluents, from each reactor unit, from the site (see Figure 5.1-3) shall be limited to the following:

a. During any calendar quarter: Less than or equal to 5 mrad for gamma radiation and less than or equal to 10 mrad for beta radiation and,

b. During any calendar year: Less than or equal to 10 mrad for gamma radiation and less than or equal to 20 mrad for beta radiation.

APPLICABILITY: At all times.

ACTION

a. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits , prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions taken to reduce releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with Specification 3.11.2.2.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.2 Dose Calculations Cumulative dose contributions for the current calendar quarter and current calendar year shall be determined in accordance with the ODCM at least once per 31 days.

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RADIOACTIVE EFFLUENTS

DOSE - RADIOIODINES, RADIOACTIVE MATERIALS IN PARTICULATE FORM AND TRITIUM

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to an individual from tritium, radioiodines and radioactive materials in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, from the site (see Figure 5.1-3) shall be limited to the following:

a. During any calendar quarter: Less than or equal to 7.5 mrem to any organ and,

b. During any calendar year: Less than or equal to 15 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

a. With the calculated dose from the release of tritium, radioiodines, and radioactive materials in particulate form, with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits,
prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause(s) for exceeding the limit and defines the corrective actions taken to reduce releases and the proposed actions to be taken to assure that subsequent releases will be in compliance with Specification 3.11.2.3.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.3 Dose Calculations Cumulative dose contributions for the current calendar quarter and current calendar year shall be determined in accordance with the ODCM at least once per 31 days.

RADIOACTIVE EFFLUENTS

DOSE - RADIOIODINES, RADIOACTIVE MATERIALS IN PARTICULATE FORM AND TRITIUM

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to an individual from tritium, radioiodines and radioactive materials in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, from the site (see Figure 5.1-3) shall be limited to the following:

a. During any calendar quarter: Less than or equal to 7.5 mrem to any organ and,

b. During any calendar year: Less than or equal to 15 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

a. With the calculated dose from the release of tritium, radioiodines, and radioactive materials in particulate form, with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits,
prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause(s) for exceeding the limit and defines the corrective actions taken to reduce releases and the proposed actions to be taken to assure that subsequent releases will be in compliance with Specification 3.11.2.3.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.3 Dose Calculations Cumulative dose contributions for the current calendar quarter and current calendar year shall be determined in accordance with the ODCM at least once per 31 days.

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RADIOACTIVE EFFLUENTS

GASEOUS RADWASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.2.4 The GASEOUS RADWASTE TREATMENT SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM shall be OPERABLE. The appropriate portions of the GASEOUS RADWASTE TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases from the site (see Figure 5.1-3), when averaged over 31 days, would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation. The appropriate portions of the VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases from the site (see Figure 5.1-3) when averaged over 31 days would exceed 0.3 mrem to any organ.*

APPLICABILITY: At all times.

ACTION:

a. With the GASEOUS RADWASTE TREATMENT SYSTEM and/or the VENTILATION EXHAUST TREATMENT SYSTEM inoperable for more than 31 days or with gaseous waste being discharged without treatment and in excess of the above limits , prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which includes the following information:

   1. Identification of the inoperable equipment or subsystems and the reason for inoperability,

   2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and

   3. Summary description of action(s) taken to prevent a recurrence.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.4.1 Doses due to gaseous releases from the site shall be projected at least once per 31 days, in accordance with the ODCM.

4.11.2.4.2 The GASEOUS RADWASTE TREATMENT SYSTEM and VENTILATION EXHAUST TREATMENT SYSTEM shall be demonstrated OPERABLE by operating the GASEOUS RADWASTE TREATMENT SYSTEM equipment and VENTILATION EXHAUST TREATMENT SYSTEM equipment for at least 15 minutes, at least once per 92 days unless the appropriate system has been utilized to process radioactive gaseous effluents during the previous 92 days.

*These doses are per reactor unit.

RADIOACTIVE EFFLUENTS

GASEOUS RADWASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.2.4 The GASEOUS RADWASTE TREATMENT SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM shall be OPERABLE. The appropriate portions of the GASEOUS RADWASTE TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases from the site (see Figure 5.1-3), when averaged over 31 days, would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation. The appropriate portions of the VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases from the site (see Figure 5.1-3) when averaged over 31 days would exceed 0.3 mrem to any organ.*

APPLICABILITY: At all times.

ACTION:

a. With the GASEOUS RADWASTE TREATMENT SYSTEM and/or the VENTILATION EXHAUST TREATMENT SYSTEM inoperable for more than 31 days or with gaseous waste being discharged without treatment and in excess of the above limits

prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which includes the following information:

1. Identification of the inoperable equipment or subsystems and the reason for inoperability,

2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and

3. Summary description of action(s) taken to prevent a recurrence.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.4.1 Doses due to gaseous releases from the site shall be projected at least once per 31 days, in accordance with the ODCM.

4.11.2.4.2 The GASEOUS RADWASTE TREATMENT SYSTEM and VENTILATION EXHAUST TREATMENT SYSTEM shall be demonstrated OPERABLE by operating the GASEOUS RADWASTE TREATMENT SYSTEM equipment and VENTILATION EXHAUST TREATMENT SYSTEM equipment for at least 15 minutes, at least once per 92 days unless the appropriate system has been utilized to process radioactive gaseous effluents during the previous 92 days.

* These doses are per reactor unit.

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3/4.11.3 SOLID RADIOACTIVE WASTE

LIMITING CONDITION FOR OPERATION

3.11.3 The solid radwaste system shall be OPERABLE and used, as applicable in accordance with a PROCESS CONTROL PROGRAM, for the SOLIDIFICATION and packaging of radioactive wastes to ensure meeting the requirements of 10 CFR Part 20 and of 10 CFR Part 71 prior to shipment of radioactive wastes from the site.

APPLICABILITY: At all times.*

ACTION:

a. With the packaging requirements of 10 CFR Part 20 and/or 10 CFR Part 71 not satisfied, suspend shipments of defectively packaged solid radioactive wastes from the site.

b. With the solid radwaste system inoperable for more than 31 days, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report which includes the following information:

1. Identification of the inoperable equipment or subsystems and the reason for inoperability,

2. Action(s) taken to restore the inoperable equipment to OPERABLE status,

3. A description of the alternative used for SOLIDIFICATION and packaging of radioactive wastes, and

4. Summary description of action(s) taken to prevent a recurrence.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.3.1 The solid radwaste system shall be demonstrated OPERABLE at least once per 92 days by:

a. Operating the solid radwaste system at least once in the previous 92 days in accordance with the PROCESS CONTROL PROGRAM, or

b. Verification of the existence of a valid contract for SOLIDIFICATION to be performed by a contractor in accordance with a PROCESS CONTROL PROGRAM.

*See Specification 6.13.1.

RADIOACTIVE EFFLUENTS

3/4.11.3 SOLID RADIOACTIVE WASTE

LIMITING CONDITION FOR OPERATION

3.11.3 The solid radwaste system shall be OPERABLE and used, as applicable in accordance with a PROCESS CONTROL PROGRAM, for the SOLIDIFICATION and packaging of radioactive wastes to ensure meeting the requirements of 10 CFR Part 20 and of 10 CFR Part 71 prior to shipment of radioactive wastes from the site.

APPLICABILITY: At all times.*

ACTION:

a. With the packaging requirements of 10 CFR Part 20 and/or 10 CFR Part 71 not satisfied, suspend shipments of defectively packaged solid radioactive wastes from the site.

b. With the solid radwaste system inoperable for more than 31 days, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report which includes the following information:

1. Identification of the inoperable equipment or subsystems and the reason for inoperability,

2. Action(s) taken to restore the inoperable equipment to OPERABLE status,

3. A description of the alternative used for SOLIDIFICATION and packaging of radioactive wastes, and

4. Summary description of action(s) taken to prevent a recurrence.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.3.1 The solid radwaste system shall be demonstrated OPERABLE at least once per 92 days by:

a. Operating the solid radwaste system at least once in the previous 92 days in accordance with the PROCESS CONTROL PROGRAM, or

b. Verification of the existence of a valid contract for SOLIDIFICATION to be performed by a contractor in accordance with a PROCESS CONTROL PROGRAM.

*See Specification 6.13.1.

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RADIOACTIVE EFFLUENTS

3/4.11.4 TOTAL DOSE

LIMITING CONDITION FOR OPERATION

3.11.4 The dose or dose commitment to any member of the public, due to releases of radioactivity and radiation, from uranium fuel cycle sources shall be limited to less than or equal to 25 mrem to the total body or any organ (except the thyroid, which shall be limited to less than or equal to 75 mrem) over 12 consecutive months.

APPLICABILITY: At all times.

ACTION:

a. With the calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Specification 3.11.1.2.a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a, or 3.11.2.3.b , prepare and submit a Special Report to the Director, Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, within 30 days, which defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the limits of Specification 3.11.4. This Special Report shall include an analysis which estimates the radiation exposure (dose) to a member of the public from uranium fuel cycle sources (including all effluent pathways and direct radiation) for a 12 consecutive month period that includes the release(s) covered by this report. If the estimated dose(s) exceeds the limits of Specification 3.11.4, and if the release condition resulting in violation of 40 CFR 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR 190 and including the specified information of § 190.11(b). Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete. The variance only relates to the limits of 40 CFR 190, and does not apply in any way to the requirements for dose limitation of 10 CFR Part 20, as addressed in other sections of this technical specification.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.4 Dose Calculations Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Specifications 4.11.1.2, 4.11.2.2, and 4.11.2.3, and in accordance with the ODCM.

RADIOACTIVE EFFLUENTS

3/4.11.4 TOTAL DOSE

LIMITING CONDITION FOR OPERATION

3.11.4 The dose or dose commitment to any member of the public, due to releases of radioactivity and radiation, from uranium fuel cycle sources shall be limited to less than or equal to 25 mrem to the total body or any organ (except the thyroid, which shall be limited to less than or equal to 75 mrem) over 12 consecutive months.

APPLICABILITY: At all times.

ACTION:

a. With the calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Specification 3.11.1.2.a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a, or 3.11.2.3.b , prepare and submit a Special Report to the Director, Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, within 30 days, which defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the limits of Specification 3.11.4. This Special Report shall include an analysis which estimates the radiation exposure (dose) to a member of the public from uranium fuel cycle sources (including all effluent pathways and direct radiation) for a 12 consecutive month period that includes the release(s) covered by this report. If the estimated dose(s) exceeds the limits of Specification 3.11.4, and if the release condition resulting in violation of 40 CFR 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR 190 and including the specified information of § 190.11(b). Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete. The variance only relates to the limits of 40 CFR 190, and does not apply in any way to the requirements for dose limitation of 10 CFR Part 20, as addressed in other sections of this technical specification.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.4 Dose Calculations Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Specifications 4.11.1.2, 4.11.2.2, and 4.11.2.3, and in accordance with the ODCM.

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3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.1 MONITORING PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.1 The radiological environmental monitoring program shall be conducted as specified in Table 3.12-1.

APPLICABILITY: At all times.

ACTION:

a. With the radiological environmental monitoring program not being conducted as specified in Table 3.12-1, in lieu of any other report required by Specification 6.9.1, prepare and submit to the Commission, in the Annual Radiological Operating Report, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.

b. With the level of radioactivity in an environmental sampling medium exceeding the reporting levels of Table 3.12-2 when averaged over any calendar quarter , prepare and submit to the Commission within 30 days from the end of the affected calendar quarter a Report pursuant to Specification 6.9.1.13. When more than one of the radionuclides in Table 3.12-2 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{concentration (1)}}{\text{limit level (1)}} + \frac{\text{concentration (2)}}{\text{limit level (2)}} + \ldots \geq 1.0$$

When radionuclides other than those in Table 3.12-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose to an individual is equal to or greater than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2 and 3.11.2.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report.

c. With fresh leafy vegetable samples or fleshy vegetable samples unavailable from one or more of the sample locations required by Table 3.12-1, in lieu of any other report required by Specification 6.9.1, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause of the unavailability of samples and identifies locations for obtaining replacement samples. The locations from which samples were unavailable may then be deleted from those required by Table 3.12-1, provided the locations from which the replacement samples were obtained are added to the environmental monitoring program as replacement locations.

d. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.1 MONITORING PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.1 The radiological environmental monitoring program shall be conducted as specified in Table 3.12-1.

APPLICABILITY: At all times.

ACTION:

a. With the radiological environmental monitoring program not being conducted as specified in Table 3.12-1, in lieu of any other report required by Specification 6.9.1, prepare and submit to the Commission, in the Annual Radiological Operating Report, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.

b. With the level of radioactivity in an environmental sampling medium exceeding the reporting levels of Table 3.12-2 when averaged over any calendar quarter , prepare and submit to the Commission within 30 days from the end of the affected calendar quarter a Report pursuant to Specification 6.9.1.13. When more than one of the radionuclides in Table 3.12-2 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{concentration (1)}}{\text{limit level (1)}} + \frac{\text{concentration (2)}}{\text{limit level (2)}} + \ldots \geq 1.0$$

When radionuclides other than those in Table 3.12-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose to an individual is equal to or greater than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2 and 3.11.2.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report.

c. With fresh leafy vegetable samples or fleshy vegetable samples unavailable from one or more of the sample locations required by Table 3.12-1, in lieu of any other report required by Specification 6.9.1, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause of the unavailability of samples and identifies locations for obtaining replacement samples. The locations from which samples were unavailable may then be deleted from those required by Table 3.12-1, provided the locations from which the replacement samples were obtained are added to the environmental monitoring program as replacement locations.

d. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

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3/4.12.2 LAND USE CENSUS

LIMITING CONDITION FOR OPERATION

3.12.2 A land use census shall be conducted and shall identify the location of the nearest milk animal, the nearest residence and the nearest garden* of greater than 500 square feet producing fresh leafy vegetables in each of the 16 meteorological sectors within a distance of five miles. For elevated releases as defined in Regulatory Guide 1.111, Revision 1, July 1977, the land use census shall also identify the locations of all milk animals and all gardens of greater than 500 square feet producing fresh leafy vegetables in each of the 16 meteorological sectors within a distance of three miles.

APPLICABILITY: At all times.

ACTION:

a. With a land use census identifying a location(s) which yields a calculated dose or dose commitment greater than the values currently being calculated in Specification 4.11.2.3 , prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the new location(s).

b. With a land use census identifying a location(s) which yields a calculated dose or dose commitment via the same exposure pathway 20 percent greater than at a location from which samples are currently being obtained in accordance with Specification 3.12.1, in lieu of any other report required by Specification 6.9.1, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the new location. The new location shall be added to the radiological environmental monitoring program within 30 days. The sampling location, excluding the control station location, having the lowest calculated dose or dose commitment via the same exposure pathway may be deleted from this monitoring program after October 31 of the year in which this land use census was conducted.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.2 The land use census shall be conducted at least once per 12 months between the dates of June 1 and October 1 using that information which will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities.

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*Broad leaf vegetation sampling may be performed at the site boundary in the direction sector with the highest D/Q in lieu of the garden census.

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RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.2 LAND USE CENSUS

LIMITING CONDITION FOR OPERATION

3.12.2 A land use census shall be conducted and shall identify the location of the nearest milk animal, the nearest residence and the nearest garden* of greater than 500 square feet producing fresh leafy vegetables in each of the 16 meteorological sectors within a distance of five miles. For elevated releases as defined in Regulatory Guide 1.111, Revision 1, July 1977, the land use census shall also identify the locations of all milk animals and all gardens of greater than 500 square feet producing fresh leafy vegetables in each of the 16 meteorological sectors within a distance of three miles.

APPLICABILITY: At all times.

ACTION:

a. With a land use census identifying a location(s) which yields a calculated dose or dose commitment greater than the values currently being calculated in Specification 4.11.2.3 , prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the new location(s).

b. With a land use census identifying a location(s) which yields a calculated dose or dose commitment via the same exposure pathway 20 percent greater than at a location from which samples are currently being obtained in accordance with Specification 3.12.1, in lieu of any other report required by Specification 6.9.1, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the new location. The new location shall be added to the radiological environmental monitoring program within 30 days. The sampling location, excluding the control station location, having the lowest calculated dose or dose commitment via the same exposure pathway may be deleted from this monitoring program after October 31 of the year in which this land use census was conducted.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.2 The land use census shall be conducted at least once per 12 months between the dates of June 1 and October 1 using that information which will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities.

* Broad leaf vegetation sampling may be performed at the site boundary in the direction sector with the highest D/Q in lieu of the garden census.

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ENCLOSURE II

Date of Amendment Request: March 7, 1984, and April 12, 1985 and August 2, 1985 (Reference PCN-83)

Description:

The proposed change would revise the administrative controls section of the Technical Specifications to reflect changes in the SCE organization structure and incorporate new NRC reporting requirements and provide minor clarification of Section 6 requirements. Proposed Change NPF-10/15-83 consists of five general types of changes:

1) Modifications due to NRC Regulatory Changes
2) Modifications due to Organization Changes
3) Modifications in Nomenclature and Changes to Achieve Consistency Throughout Technical Specifications
4) Additional Limitations
5) Administrative Controls Relaxation

Basis for No Significant Hazards Determination:

The commission has provided guidance concerning the application of standards for determining whether or not a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments considered not likely to involve significant hazards considerations. Example (i) relates to a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. Example (ii) relates to a change that constitutes an additional limitation, restriction or control not presently included in the technical specifications: for example, a more stringent surveillance requirement. Example (vi) relates to a change which either may result in some increase in the probability or consequences of a previously analyzed accident or may in some way reduce a safety margin, but where the results of the change are clearly within all acceptance criteria with respect to the system or component specified in the Standard Review Plan: For example, a change resulting from the application of a small refinement of a previously used calculational model or design method. Example (vii) relates to a change to make a licensee conform to changes in the regulations, where the licensee change results in very minor changes to facility operations clearly in keeping with the regulations. Each of the changes included in proposed change NPF-10/15-83 is similar to one of these examples. On this basis, it is proposed that these changes do not involve significant hazards considerations. The following is a detailed description of each part of the proposed change and how each is similar to one of the examples provided in 48 FR 14870.

1. Modifications due to NRC Regulatory Changes

a) T.S. Section 1.26 provides the definition of a REPORTABLE OCCURRENCE. The proposed change would replace Reportable Occurrence with Reportable Event consistent with NRC Generic Letter 83-43.

b) T.S. Section 6.5.1.6.b states that the On Site Review Committee shall be responsible for the review of events that require 24-hour written notification of the NRC. The proposed change would require the On Site Review Committee (OSRC) to be responsible for the review of all reportable events. This change is consistent with Generic Letter 83-43.

c) T.S. Section 6.5.3.4.g requires that the Nuclear Safety Group (NSG) review all events requiring 24-hour written notification to the Commission. The proposed change would require NSG review of all reportable events. This is consistent with Generic Letter 83-43.

d) T.S. Section 6.6 requires for all reportable occurrences that the Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9. Additionally, each reportable occurrence requiring 24-hour notification to the Commission shall be reviewed by the OSRC and

submitted to the NSG and the Manager of Nuclear Operations. The proposed change would change reportable occurrence to reportable events, change the reference of T.S. Section 6.9 to 10 CFR 50.73 and change the Manager of Nuclear Operations to the Vice President and Site Manager, Nuclear Generation Site. This is consistent with Generic Letter 83-43.

e) T.S. Section 6.9.1 would be revised to change the title from Routine Reports and Reportable Occurrence to Routine Reports. This change is consistent with Generic Letter 83-43.

f) T.S. 6.9.1.11, 6.9.1.12 and 6.9.1.13 provide the requirements for prompt notification with written followup and for thirty day written reports for all reportable occurrence. The proposed change would delete these sections from the Technical Specifications as these requirements are replaced by 10 CFR 50.72 and 50.73 per Generic Letter 83-43.

g) The proposed change would revise T.S. Section 6.10.1.C to change the reference of reportable occurrence to a reportable event, consistent with Generic Letter 83-43.

h) LCO 3.3.3.8 provides the requirements for the radioactive effluent monitoring instrumentation channel operability. An associated action statement (c) specifically states that the

provisions of specification 3.0.3, 3.0.4, and 6.9.1.13b are not applicable to this specification. The proposed change would delete the reference to T.S. 6.9.1.13b as T.S. Section 6.9.1.13b will be deleted from the technical specifications by this proposed change pursuant to Generic Letter 83-43.

i) LCO 3.3.3.9 provides the requirements for the radioactive gaseous effluent monitoring instrumentation channel operability. An associated action statement (c) specifically states that the provisions of specifications 3.0.3, 3.0.4, and 6.9.1.13b are not applicable. The proposed change will remove T.S. Section 6.9.1.13b as this section will be deleted from the technical specifications pursuant to Generic Letter 83-43.

j) The proposed change would add a new T.S. Section 6.9.1.1.12 pursuant to NUREG-0737, Item II.K.3.17 and would require that an annual report be submitted to the Director, Office of Nuclear Reactor Regulator detailing the cumulative outage time for Emergency Core Cooling Systems (ECCS) and components. The report would contain (1) the ECCS system or component involved; (2) the cause of the outage; (3) the duration of the outage; and (4) the corrective actions taken to prevent recurrence of the ECCS outage. The annual report would also discuss any proposed changes to improve ECCS equipment availability.

k) LCO 3.4.7 provides the specific activity limits for the primary coolant. An associated action statement (d) requires that with the specific activity above the specified limits, a Reportable Occurrence shall be prepared and submitted to the Commission pursuant to T.S. 6.9.1. The proposed change would revise Reportable Occurrence to Special Report and revise the reference from 6.9.1 to 6.9.2.

l) LCO 3.11.1.2 provides the limits for dose and dose commitment to an individual from radioactive materials in released liquid effluent. An associated action statement (b) specifically states that the provisions of specification 3.0.3, 3.0.4 and 6.9.1.13b are not applicable. The proposed change would delete the reference to 6.9.1.13b as the current T.S. Section 6.9.1.13b will be deleted from the technical specifications pursuant to Generic Letter 83-43.

m) LCO 3.12.1 provides the requirements for the radiological monitoring program. An associated action statement (b) states that with the level of radioactivity in an environmental sampling medium exceeding specified levels, prepare and submit to the commission a Report pursuant to specification 6.9.1.13. The proposed change would revise Report to Special Report and revise the reference to 6.9.1.13 to 6.9.2 consistent with the proposed changes detailed above.

Because each of the proposed changes detailed above provide Technical Specification compliance with changes in NRC regulations, (10 CFR 50.72 and 50.73) provided by Generic Letter 83-43, effective January 1, 1984, and with NUREG-0737, Item II.K.3.17, these proposed changes are similar to Example (vii) to 48 FR 14870. On this basis, it is proposed that these changes do not involve a significant hazards consideration.

2. Modifications due to Organization Changes

a) The proposed change would revise various sections of the administrative section of the technical specifications to reflect personnel title revisions. The proposed change would:

1) Change Shift Supervisor to Shift Superintendent
2) Change Manager, Nuclear Operations to Vice President and Site Manager, Nuclear Generation Site
3) Change Nuclear Safety Group (NSG) Chairman to NSG Supervisor

b) T.S. Section 6.2 Figures 6.2-1 and 6.2-2 provide the structure for the off-site and on-site utility organization. The proposed change would revise Figures 6.2-1 and 6.2-2 to reflect the new utility organization structure. The organization would be modified to include the Vice President and Site Manager, Nuclear Generator Site and the Vice President, Nuclear Engineering, Safety and Licensing. Previously, these areas were under one

Vice President. A new position, Manager of Nuclear Generation Services, would be responsible for the administration of the design, construction, and operation/maintenance support activities of San Onofre Units 1, 2 and 3. These changes provide increased executive attention and oversight over all nuclear activities.

c) T.S. Section 6.2.3.4 currently requires the Independent Safety Engineering Group (ISEG) to make detailed recommendations for improving plant safety by any means to the Supervisor, Nuclear Safety Group (NSG). The proposed Change would replace the Supervisor, NSG with the Manager, Nuclear Safety.

d) T.S. Section 6.2.3.5 currently requires that records of activities performed by the ISEG to be prepared, maintained and forwarded each calendar month to the NSG Supervisor. The proposed change would replace the Supervisor, NSG with the Manager, Nuclear Safety.

e) T.S. Section 6.5.1.7b requires that written notification be provided within 24 hours to the Vice President and Site Manager, Nuclear Generation Site and the Supervisor, NSG of disagreement between the OSRC and the Station Manager. The specification currently states that the Station Manager shall have responsibility for resolution of such disagreements. The

proposed change would state that the Vice President and Site Manager, Nuclear Generation Site shall have responsibility for resolution of such disagreements.

f) T.S. Section 6.5.2.1 currently states that the Station Manager shall assure that procedures and programs required by T.S. Section 6.8 "Procedures and Programs" and changes thereto shall be prepared by a qualified individual/organization. The proposed change would revise the Station Manager to Vice President and Site Manager, Nuclear Generation Site and would add the requirement that documentation of these activities be provided to the Nuclear Safety Group.

g) T.S. Section 6.5.2.2 provides the requirements for the preparation of proposed changes to the technical specifications. The proposed change would add the requirement that documentation of technical specification change activities be provided to the Vice President and Site Manager, Nuclear Generation Site and to the Nuclear Safety Group.

h) T.S. Section 6.5.2.3 provides the requirements for review and approval of proposed modifications to unit nuclear safety related structures, systems and components and states that prior to implementation the proposed modifications shall be approved by the Station Manager. The proposed change would revise the

Station Manager to the Vice President and Site Manager, Nuclear Generation Site and add the requirement that documentation of these modification activities be provided to the Vice President and Site Manager, Nuclear Generation Site and the Nuclear Safety Group.

i) T.S. Section 6.5.3.6 states that the Nuclear Safety Group shall report to and advise the Manager, Nuclear Engineering and Safety on those areas of responsibility specified in Sections 6.5.3.4 and 6.5.3.5. The proposed change would revise the Manager, Nuclear Engineering and Safety to the Manager, Nuclear Safety.

j) T.S. Section 6.8.2 specifies that each procedure of specification 6.8.1 and changes thereto shall be approved by the Station Manager or by (1) The Manager, Operations, (2) the Manager, Technical, (3) the Manager, Maintenance, (4) the Deputy Station Manager, or (5) the Manager, Health Physics as previously designated by the Station Manager. The proposed change would revise:

1) Station Manager to Vice President and Site Manager, Nuclear Generation Site,

2) Manager, Operations to Station Manager,

3) Managers Technical and Maintenance to Manager of Nuclear Generation Services, and

4) Manager, Health Physics to Cognizant Managers.

k) T.S. 6.5.2.4 specifies that the personnel responsible for reviews performed in accordance with T.S. 6.5.2.1, 6.5.2.2 and 6.5.2.3 shall be members of the station supervisory staff, previously designated by the Station Manager to perform such reviews. The proposed change would allow station/site supervisory staff previously designated by the Vice President and Site Manager, Nuclear Generation Site to perform such reviews.

l) T.S. 6.5.2.5 specifies that the personnel responsible for review of proposed test and experiments which affect station nuclear safety and are not addressed in the FSAR or in the Technical Specifications shall be members of the station management staff previously designated by the Station Manager. The proposed change would allow station/site management staff previously designated by the Vice President and Site Manager, Nuclear Generation Site to perform such reviews.

m) T.S. 6.5.2.6 provides the review requirements for the station security program and security program implementing procedures

stating that review should be at least once per 12 months and that recommended changes be approved by the Station Manager and transmitted to the Manager of Nuclear Operations and the NSG. The proposed change would require that recommended changes to the station security plan to be approved by the Station Manager and transmitted to the Vice President and Site Manager, Nuclear Generation Site and to the Nuclear Safety Group. The proposed change would also require that the implementing procedures be prepared and approved in accordance with specification 6.8.

n) T.S. 6.5.2.7 provides the review requirements for the station emergency plan and implementing procedures stating that review shall be at least once per 12 months and that recommended changes be approved by the Station Manager and transmitted to the Manager of Nuclear Operations and to the NSG. The proposed change would allow recommended changes to the emergency plan and implementing procedures to be approved by the Station Manager and transmitted to the Vice President and Site Manager, Nuclear Generation Site and to the NSG. The proposed change would also specify that implementing procedures be prepared and reviewed in accordance with specification 6.8.

o) T.S. 6.5.2.9 states that changes to the process control program, offsite dose calculation manual and the radwaste treatment systems shall be a review by a qualified individual/organization

designated by the Station Manager. The proposed change would identify the Station Manager as responsible for the assurance of the performance of a review by a qualified individual/organization and may designate the approval of changes to the offsite dose calculation manual, the process control program and the radwaste treatment systems. The proposed change would also require documentation of these activities to be sent to the Vice President and Site Manager, Nuclear Generator Site and to the Nuclear Safety Group.

Because each of the proposed changes detailed above reflect changes in the on-site and off-site utility organization and in each case the function performed before and after the proposed change is the same, these changes are purely administrative. These proposed changes are similar to Example (i) to 48 FR 14870 and on this basis, it is proposed that a significant hazards consideration is not involved with these changes.

3. Modifications in Nomenclature and Changes to Achieve Consistency Throughout Technical Specifications

a) T.S. 6.5.2.10 requires that reports documenting each of the activities performed under specifications 6.5.2.1 through 6.5.2.9 shall be maintained and copies provided to the Manager of Nuclear Operations and the Nuclear Safety Group. The

proposed change would delete the requirement to provide copies to the Manager of Nuclear Operations and the Nuclear Safety Group but still require copies to be maintained.

b) T.S. 6.9.1.7 provides, among other items, that the annual radiological environmental operating reports shall include a map of all sampling locations keyed to a table giving distances and directions from one reactor. The proposed change would provide for the use of the site reference point instead of one reactor for the location key.

c) T.S. 6.9.1.9 currently states that the radioactive effluent release report shall include an assessment of radiation doses to the likely most exposed member of the public. The current acceptable method for calculating the dose contribution from liquid and gaseous effluents are those given in Reg. Guide 1.109, Rev. 1. The proposed change would allow the dose contribution from liquid and gaseous effluents to be calculated based on the Offsite Dose Calculation Manual.

d) T.S. 6.9.1.10 provides the requirements for the Monthly Operating Report and states that routine reports of operating statistics, shutdown experience and challenges to the safety valves shall be included in the monthly report. It also states that, a report of any major changes to the radioactive waste

treatment systems shall be included in the monthly operating report for the period in which the evaluation was reviewed and accepted in accordance with T.S. 6.5.2. The proposed change would require that only challenges to the pressurizer safety valves instead of all safety valve be included in the monthly operating report. The proposed change would also require that changes to the radioactive waste treatment systems be submitted with the monthly operating report for the period in which the change was made effective.

e) T.S. 6.9.2 currently states that special reports shall be submitted to the NRC Regional Administrator within the period specified for each report. The proposed change would provide clarification by stating that special reports shall be submitted to the NRC Regional Administrator within the time period specified for each report unless otherwise indicated.

f) T.S. Section 6.10.2.1 states that records of quality assurance activities required by the QA Manual shall be retained for the duration of the Unit Operating License. The proposed change would require retention of records of quality assurance activities not included in Section 6.10.1 that are not required by the QA manual.

g) T.S. 6.13.2 provides the requirements for the Process Control Program (PCP) and currently states that licensee initiated

changes to the PCP shall be submitted to the Commission in the semi-annual Radioactive Effluent Release Report for the period in which the change(s) was made. It also states that a change to the PCP shall become effective upon review and acceptance pursuant to T.S. 6.5.2. The proposed change would clarify the reporting requirement by stating that changes to the PCP be reported in the semi-annual radioactive effluent release report for the period in which the change(s) was made effective. The proposed change would allow a change to the PCP to become effective only upon approval pursuant to T.S. 6.5.9.2.

h) T.S. 6.14.2 provides the requirements for the Offsite Dose Calculation Manual (ODCM) and currently states for licensee initiated changes to the ODCM, the monthly operating report shall contain documentation of the fact that the change to the ODCM has been reviewed and found acceptable pursuant to T.S. 6.5.2. The current specification also states that a proposed change to the ODCM shall become effective upon review and acceptance pursuant to T.S. 6.5.2. The proposed T.S. change would require documentation of the fact that changes to the ODCM to be reviewed and found acceptable pursuant to T.S. 6.5.2.9 and reported in the semiannual operating report. The proposed change would also state that a change to the ODCM would become effective upon approval pursuant to T.S. 6.5.9.2.

i) T.S. 6.15.1 provides the requirements for licensee initiated changes to the radioactive waste treatment systems and states

that any major changes shall be reported to the commission in the monthly operating report for the period in which the evaluation of the change was performed. The current specification also states that a change to the radioactive waste treatment systems shall become effective upon review and acceptance pursuant to T.S. 6.5.2 The proposed T.S. change would require changes to the radioactive waste treatment systems to be reported in the semiannual operating report for the period in which the change was made effective pursuant to T.S. 6.5.2.9. Additionally, the proposed T.S. change would state that a change to the radioactive waste treatment systems shall become effective upon review and approval pursuant to T.S. 6.5.2.9.

j) LCO Sections 3.7.8.2, 3.11.1.2, 3.11.1.3, 3.11.2.2, 3.11.2.3, 3.11.2.4, 3.11.3, 3.11.4, 3.12.1, 3.12.2 and Surveillance Requirement 4.8.1.1.3 all currently require the submittal of a Special Report to the Commission in lieu of any other required reports when the systems, components or processes associated with the respective LCO fail or are not in compliance with the Technical Specifications. The proposed change would remove the words "in lieu of any other required reports" because the Technical Specifications cannot take exception to any requirements, reporting or otherwise, of the Federal Regulations. This proposed change removes this inconsistency with the Federal Regulations.

k) LCO 3.8.1.1 surveillance requirement 4.8.1.1.3 provides the reporting requirements for diesel generator failures and states that all diesel generator failures, valid or non-valid, shall be reported to the Commission pursuant to specification 6.9.1. The proposed change would revise the reference from 6.9.1 to 6.9.1.10.

l) Surveillance Requirement 4.4.4.5.c requires that the results of steam generator tube inspections which fall into Category C-3 (more than 10% of the total tubes inspected are degraded or more than 1% of the inspected tubes are defective) and require prompt notification of the Commission shall be reported pursuant to Specification 6.9.1, "Routine Reports and Reportable occurances," prior to resumption of plant operation. The proposed change would require C-3 steam generator inspection results to be reported pursuant to Specification 6.6, "Reportable Event Action," if applicable, prior to resumption of plant operation.

m) T.S. Section 6.8.3c specifies that temporary changes to the procedures of 6.8.1 may be made provided that the change is documented, reviewed and approved by the Station Manager, or (1) the Deputy Station Manager, (2) the Manager, Operations, (3) the Manager, Maintenance, (4) the Manager, Technical, or (5) the Manager, Health Physics as previously designated by the Station

Manager, within 14 days of implementation. The proposed change would require the temporary procedure change to be documented, reviewed and approved by responsible management, as deliniated in 6.8.2, within 14 days of implementation.

n) T.S. Section 6.8.4c.(iii) currently states that the secondary water chemistry monitoring program shall include identification of process sampling points, including monitoring the discharge of the condensate pumps for evidence of condenser in-leakage. The proposed change would delete specific identification of the condensate pump discharge from this specification. The sampling of the condensate in the condenser hotwells prior to the condensate pumps is included in the secondary water chemistry monitoring program. Since this is an earlier indication of out of specification chemistry parameters, it is a more conservative condition. Additionally, deleting the specific identification of the condensate pumps achieves consistency throughout the technical specifications as no other sampling points are specifically identified.

Each of the proposed changes detailed above provide for a change in nomenclature or achieve consistency throughout the Technical Specifications. In each case, the intent of the specification is the same before and after the proposed change. These proposed changes are similar to Example (i) and on this bases, it is proposed that these changes do not involve a significant hazards consideration.

4. Additional Limitations

a) T.S. Section 6.5.1.5 provides the minimum quorum requirements for the On Site Review Committee (OSRC) necessary for the performance of OSRC responsibility and authority. The current specification states that the Chairman or his designated alternate and 4 members including alternates are required to form a quorum. The proposed change would state that the Chairman or his designated alternate and one-half the remaining membership including alternates is required for a quorum. There are currently ten OSRC members excluding the Chairman. Because the proposed change would require 5 (half often) OSRC members instead of the current 4 members to constitute a quorum, this is an additional limitation.

b) T.S. Section 6.8.3b specifies that temporary changes to procedures of Section 6.8.1 may be made provided that the change is approved by two members of the plant management staff, at least one of whom is an SRO on the affected unit. The proposed change would require the temporary change to be approved by two members of the site/station management staff exercising responsibility in the specific area and unit or units affected by the change, at least one of whom is an SRO. By adding the requirement that temporary changes to the procedures of section 6.8.1 be approved by management staff responsible for the affected area is an additional limitation as it prevents all but cognizant management staff from approving temporary changes.

c) T.S. 6.9.1.9 provides the requirements regarding the preparation of the radioactive effluent release report and states that the annual release summary report may be either in the form of an hour by hour listing of wind speed, direction and atmospheric stability and precipitation (if measured) on magnetic tape or in the form of stability. The proposed change would require the addition of joint frequency distributions of wind speed and wind direction if the annual summary is in the form of stability. The proposed change would also allow for retaining this summary of required meteorological data on site in a file that shall be provided to the NRC on request in lieu of submission with the first half year Radioactive Effluent Release Report. Because the proposed change requires additional information to be recorded and stored, this change constitutes an additional limitation.

d) T.S. Table 6.2-1 provides the requirements for minimum shift crew composition stating the numbers of Shift Supervisors, Senior Reactor Operators, Reactor Operators, Auxiliary Operators and Shift Technical Advisors. The current specification also states that during the absence of the Shift Superintendent from the Control Room Area while the Unit is in Modes 5 or 6, a Senior Reactor Operator (SRO) or Reactor Operator (RO) shall be designated to assume the Control Room Command function. The proposed change would revise the specification to recognize the

Shift Superintendent and the Control Room Supervisor as titles of responsible individuals. The proposed change would also require that while the Shift Superintendent is absent from the Control Room Area while the Unit is in Mode 5 or 6 an SRO, if the other unit is in Modes 1, 2, 3 or 4, or an SRO or RO, if the other unit is in Modes 5 or 6, shall be designated to assume the Control Room command function. Because the proposed change allows only an SRO and not an RO as currently allowed to assume the Control Room Command function in the absence of the Shift Supervisor if the Unit is in modes 5 or 6 and the other unit is in modes 1, 2, 3 or 4, this proposed change is an additional limitation.

Each of the proposed changes detailed above provide new requirements or increase the requirements of the existing specifications. In each case the proposed new specification is more restrictive than the existing specification. These changes are similar to Example (ii) to 48 FR 14870 and on this basis it is proposed that the above changes do not involve a significant hazards consideration.

5. Administrative Controls Relaxation

a) T.S. Figure 6.2-3 provides the configuration of the Control Room Area. The proposed change would add the Operations Support

Office to the Control Room Area. This addition to the defined control room area will allow the Control Room Supervisor to be in the Operations Support Office during normal plant operation instead of in the control room proper as currently required. 10 CFR 50.54 (m)(2)(iii) states:

> When a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by the units technical specifications, each licensee shall have a person holding a senior operators license for the nuclear power unit in the control room at all times. In addition to this senior operator, a licensed operator or senior operator shall be present at the controls at all times.

The Control Room Supervisor satisfies the requirement to have a senior operator in the control room and provides direction and assessment of the licensed operator activities. He is not required to operate the plant controls which is the function of the operator, nor is he required to "directly supervise the activities of the licensed operator, except during core alteration activities," as described in 10 CFR 50.54 (m)(2)(iv). Therefore, the proposed addition of the Operations Support Office to the defined Control Room Area is clearly within all acceptance criteria regarding control room supervision but is a relaxation of the current Technical Specification. This proposed change is similar to Example (vi).

a) The proposed change would add T.S. Section 6.2.2.f to require the development and implementation of administrative procedures to limit the working hours of unit staff in the following job classifications:

1. Shift Superintendents, Control Room Supervisors, Control Operators, Assistant Control Operators, Nuclear Plant Equipment Operators, Plant Equipment Operators:

2. Electricians and their first line supervisors;

3. I&C Technicians, Computer Technicians, Test Technicians and their first line supervisors;

4. Operational Health Physics Technicians and their first line supervisors;

5. Boiler and Condenser Mechanics, Machinists, Welders, Crane Operators and their first line supervisors;

6. Contractor or other Department personnel preforming functions identical to those performed by personnel identified in items 1 through 5 above and within the organizational framework of the station.

The addition of this section to the Technical Specifications would specify the allowable overtime limits for individuals vital for the safety of nuclear plant operations. The proposed change would not specify overtime limits for other plant personnel included in the current specification. This proposed change is a reduction in current requirements however, because personnel vital for safe plant operations are included, the intent of the original specification is retained. Therefore, this proposed change is similar to Example (vi).

Each of the proposed changes detailed above provide for a reduction of current requirement, but where the results of the change are clearly within all acceptance criteria with respect to the system specified. In each case, the proposed change meets the intent of the existing specification. These changes are similar to Example (vi) to 48 FR 14870 and on this basis it is proposed that the above changes do not involve a significant hazards consideration.