

# YANKEE ATOMIC ELECTRIC COMPANY

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2.C.15.1  
FYR 85-101  
PC #189

September 30, 1985

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation

References: (a) License No. DPR-3 (Docket No. 50-29)

Subject: Request for Changes to Radiological Effluent Technical  
Specifications 3.12.1; 6.5.2.9; and 6.8.1

Dear Sir:

Pursuant to Section 50.59 of the Commissioner's Rules and Regulations, the Yankee Atomic Electric Company hereby requests the authorization to make the following changes.

## PROPOSED CHANGE:

Reference is made to the Technical Specifications of License No. DPR-3.

1. We propose to modify Technical Specification 3.12.1.b, second paragraph, by substituting reference to Table 6.9-1 with that of Table 3.12-2.
2. We propose to modify the type of analysis required by Technical Specification Table 3.12-1, under "Exposure Pathway" 3.a., by deleting reference to the I-131 analysis for surface water samples.
3. We propose to modify the audit requirements as worded in Technical Specification 6.5.2.9.k by removing reference to the Quality Assurance Program activities to meet the provisions of Regulatory Guide 1.21 and Regulatory Guide 4.1, and clarifying that the audit is to cover the performance of activities affecting quality as required by effluent and environmental monitoring procedures.
4. We propose to amend the requirements for written procedures as stated in Technical Specification 6.8.1.d by removing any implication that the company's Quality Assurance Program requires separate implementing procedures for effluent and environmental monitoring activities. The proposed change will state that plant procedures include quality assurance aspects for effluent and environmental monitoring.

Amended pages covering the proposed changes noted above are attached for your review.

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REASON AND BASIS FOR CHANGE:

1. The change reflected by making reference to Table 3.12-2 instead of Table 6.9-1 is to correct a typographical error. The Technical Specifications as now written contain no Table 6.9-1. The insertion of reference to Table 3.12-2 keeps Technical Specification consistent with the NRC's model Radiological Effluent Technical Specifications (RETS) as presented in NUREG-0472, Revision 3.
2. For the changes in Table 3.12-1, Item 3.a., the I-131 analysis required under "Type and Frequency of Analysis" should be deleted since this specific analysis is not required by NRC guidance unless surface waters that are being sampled are associated with a drinking water pathway. Since the Deerfield River is not utilized for drinking water systems, this specific analysis is not necessary. This modification is consistent with the NRC's model RETS (NUREG-0472, Revision 3) and the Staff's branch technical position on environmental monitoring, and will allow a reduction in the laboratory analyses which are presently required.
3. For proposed change 3 above, it is our present understanding of the intent of the NRC's guidance on Radiological Effluent Technical Specifications as it related to audits of quality assurance activities not to require audits of the plant's Quality Assurance Program for inclusion of the provisions of Regulatory Guides 1.21 and 4.1, but to audit the performance of activities affecting quality as required by plant procedures which implement effluent and environmental monitoring requirements. The wording in Specification 6.5.2.9.k is proposed to be changed to clearly state this intent.
4. As with Item 3 above, Section 6.8.1.d of the Technical Specifications is requested to be changed such that it is clear that it is not the intent to prepare separate implementation procedures for the Quality Assurance Program as it may relate to effluent and environmental monitoring. The revised wording reflects our understanding of NRC's intent to ensure that procedures written to implement the effluent and environmental monitoring technical specifications include items which give assurance that the measurements or determinations being made as a result of the procedures are appropriate with respect to the limiting conditions of operation as put forth in the RETS.

SAFETY CONSIDERATIONS:

The Commission has provided guidance concerning the application of the standards for determining whether a "significant hazards" consideration exists by providing certain examples (48FR14870).

One of these examples (i) states that a purely administrative change to technical specifications, such as correction of an error, does not involve a significant hazards consideration. Proposed change (1) above dealing with the reference to Table 3.12-2 constitutes such a purely administrative change.

Another example of amendments that are considered not likely to involve significant hazards considerations is (vii). A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations.

Proposed changes (2), (3), and (4) above all come under this category. Dropping the requirement for I-131 analysis of surface waters (Deerfield River) is consistent with the NRC guidance on implementing the regulatory requirements for environmental monitoring. Items 3 and 4 clarify administrative controls to reflect our understanding of NRC acceptable steps to assure quality in the performance of activities related to effluent and environmental monitoring.

We therefore conclude that these proposed changes do not constitute a significant hazards consideration as defined in 10CFR50.92(c).

This proposed change has been reviewed by the Nuclear Safety Audit and Review Committee.

FEE:

An application fee of \$150.00 is enclosed in accordance with 10CFR170.21.

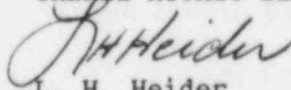
SCHEDULE OF CHANGE:

These changes to the Yankee Technical Specifications will be implemented upon Commission approval. We request approval of this submittal within 60 days of its receipt.

We trust that you will find this submittal satisfactory; however, should you have any questions regarding this matter, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

  
L. H. Heider  
Vice President

MS/jm  
Attachment

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A. Soucy

Notary Public

## My Commission Expires

August 29, 1991