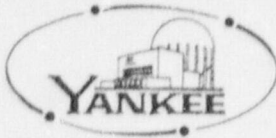


Telephone 617 366-9011

TWX
710-390-0739

WYR 75-80

Regulatory Docket File

YANKEE ATOMIC ELECTRIC COMPANY

20 Turnpike Road Westborough, Massachusetts 01581

July 31, 1975

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

Attention: Office of Nuclear Reactor Regulation

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

Dear Sir:

Pursuant to Section 50.59 of the Commission's Rules and Regulations Yankee Atomic Electric Company hereby proposes the following modification to Appendix A to Operating License No. DPR-3, Technical Specifications.

PROPOSED CHANGE: Reference is made to Section E, "Plant Reporting Requirements" of the Technical Specifications. We propose removing paragraph h, Environmental Monitoring, from Section E.1 and inserting it into a new Section E.2 entitled Annual Reports. The present Sections E.2, E.3, and E.4 will be renumbered to E.3, E.4, and E.5 respectively. Paragraph E.1.i and E.1.j will be renumbered E.1.h and E.1.i, respectively. For your convenience we have enclosed pages 14 through 17 from our plant Technical Specification book showing the proposed changes. The proposed change will require an annual environmental radiological report instead of the present semi-annual report. Ninety (90) days for submission after the end of the report period will be allowed.

REASON FOR CHANGE: Section E, "Plant Reporting Requirements", of the Technical Specification presently indicates that environmental monitoring reports shall be filed with the NRC sixty (60) days after January 1 and July 1 of each year. This requirement had bases in Regulatory Guide 4.1, "Measuring and Reporting of Radioactivity in the Environ. of Nuclear Power Plants, (as issued 1/18/73)". However, in April, 1975, NRC issued Revision 1 to Regulatory Guide 4.1 which no longer specifies a frequency for reporting.

It is our understanding that the forthcoming Regulatory Guide 4.8, "Environmental Technical Specifications for Nuclear Power Plants", will now only ask that an annual environmental radiological monitoring report be submitted to NRC within 90 days after January 1 each year.

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8011180 283 am
THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

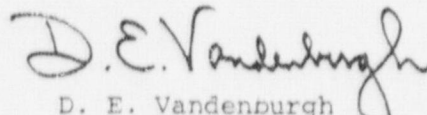
In accordance with what is expected in the new Regulatory Guide 4.8, we are requesting at this time that the reporting schedule for the environmental radiological monitoring program be changed to an annual report, submitted within ninety (90) days after January 1 of each year. Action on this proposal is requested as soon as possible since the present semi-annual report schedule requires that report preparation be initiated with a report to be submitted to NRC by August 30, 1975. This would cause a duplication of work if after this date, Regulatory Guide's 4.8 reporting schedule is incorporated into the Technical Specifications. Then the first annual report, which would be filed for the 1975-reporting period, would include data which had already been submitted in the semi-annual report.

SAFETY CONSIDERATIONS: This proposed change is not safety related. This submittal has been reviewed by the Nuclear Safety Audit and Review Committee.

SCHEDULE OF CHANGE: Yankee Nuclear Power Station Technical Specifications will be changed immediately upon Commission approval.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

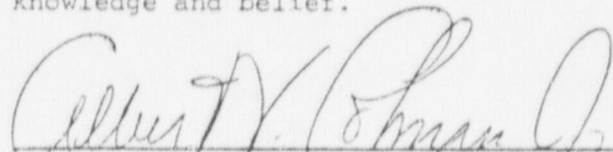

D. E. Vandenburg
Vice President

COMMONWEALTH OF MASSACHUSETTS)

) ss.

COUNTY OF WORCESTER)

Then personally appeared before me, D. E. Vandenburg, who, being duly sworn did state that he is Vice President of Yankee Atomic Electric Company, that he is duly authorized to execute and file the foregoing request in the name and on behalf of Yankee Atomic Electric Company, and that the statements therein are true to the best of his knowledge and belief.


Albert V. Colman, Jr. Notary Public
My Commission Expires April 4, 1975

- (f) Total volume (in liters) of dilution water used prior to release from the restricted area.
- (g) Total gross radioactivity (in curies) by nuclide released based on representative isotopic analyses performed.
- (h) Percent of technical specification limit for total radioactivity.

g. Solid Waste

- 1. The total amount of solid waste shipped (in cubic feet).
- 2. The total estimated radioactivity (in curies) involved.
- 3. Disposition including date and destination.

h. Occupational Personnel Radiation Exposure

Proposed
Change 129

Tabulate the number of personnel exposure for facility operations personnel (permanent and temporary) in the following exposure increments for the reporting period:

less than 100 mrem, 100-250 mrem, 250-500 mrem, 500-750 mrem, 750-1000 mrem, 1-2 rem, 2-3 rem, 3-4 rem, 4-5 rem, 5-6 rem, and greater than 6 rem.

Change
No. 111

Tabulate the number of personnel receiving more than 500 mrem exposure in the reporting period according to duty function. i.e., routine plant surveillance and inspection (regular duty), routine plant maintenance, special plant maintenance (describe maintenance), routine refueling operations, special refueling operations (describe operation), and other job related exposures. Annually tabulate the number of personnel receiving more than 2500 mrem and report major cause(s). Annually tabulate the number of personnel receiving more than 3 rem and report major causes.

i. Primary Coolant Chemistry

Proposed
Change 129

A tabulation on a monthly basis of the maximum, average, and minimum values for the following primary coolant system parameters:

- (i) Gross radioactivity in Ci/ml,
- (ii) Suspended solids in parts per million,
- (iii) Gross tritium in Ci/ml,
- (iv) Iodine 131 in Ci/ml,
- (v) Ratio of Iodine 131 to Iodine 133
- (vi) Hydrogen in cc per kg,
- (vii) Lithium in parts per million,
- (viii) Boron-10 in parts per million,
- (ix) Oxygen-16 in parts per billion,
- (x) Chloride in parts per million, and
- (xi) pH at 25°C.

Change
No. 111

2. Annual Reports

Environmental Radiological Monitoring

A report on the Environmental Radiological Monitoring Program for the previous twelve months of operation shall be submitted as a separate document within ninety days after January 1 of each year.

Proposed Change 129

1. For each medium sampled during the reporting period, e.g., air, baybottom, surface water, soil, fish, include:
 - (a) Number of sampling locations,
 - (b) Total number of samples,
 - (c) Number of locations at which levels are found to be significantly above local backgrounds, and
 - (d) Highest, lowest, and the average concentrations or levels of radiation for the sampling point with the highest average and description of the location of that point with respect to the site.
2. If levels of radioactive materials in environmental media as determined by an environmental monitoring program indicate the likelihood of public intakes in excess of 1% of those that could result from continuous exposure to the concentration values listed in Appendix B, Table II, Part 20, estimates of the likely resultant exposure to individuals and to population groups, and assumptions upon which estimates are based shall be provided.
3. If statistically significant variations of offsite environmental concentrations with time are observed, correlation of these results with effluent release shall be provided.

3. Non-Routine Reports

a. Abnormal Occurrence Reports

A notification shall be made within 24 hours by telephone and telegraph to the Director of the Regional Regulatory Operations Office (cc to the Director of Licensing), followed by a written report within 10 days to the Director of the Regional Regulatory Operations Office in the event of an abnormal occurrence. The written abnormal report should follow the format presents in Regulatory Guide 1.16.

Change
No. 111

b. Unusual Events

A written report shall be forwarded within 30 days to the Director of Regional Regulatory Operations Office in the event of:

Change
No. 111

1. Discovery of any substantial errors in the transient or accident analyses or in the methods used for such analyses, as described in the Safety Analysis Report or in the bases for the technical specifications.
2. Discovery of any substantial variance from performance specifications contained in the technical specifications or in the Safety Analysis Report.
3. Discovery of any condition involving a possible single failure which, for a system designed against assumed single failures, could result in a loss of the capability of the system to perform its safety function.

4. Special Reports

Special reports shall be submitted in writing within 90 days to the Director of Licensing, USNRC, Washington, D.C. 20555.

Special reports shall be submitted covering inspection tests, and maintenance that are appropriate to assure safe operation of the plant. The frequency and content of these special reports are determined on an individual case basis and designated in these technical specifications. Such reports shall include:

- a. In-service inspection.
- b. Special maintenance reports.
- c. Authorization of changes, tests, and experiments in accordance with 10 CFR 50.59.
- d. Containment leak rate tests.
- e. Radioactive effluent releases.
- f. Materials radiation surveillance specimens reports.
- g. Fuel performance following each refueling or partial refueling.

5. Abnormal Occurrence

Any of the following:

- a. A safety system setting less conservative than the limiting setting established in the technical specifications,
- b. Violation of a limiting condition for operation established in the technical specifications,
- c. An uncontrolled or unplanned release of radioactive material from the site boundary. | Change
No. 111
- d. Failure of one or more components of an engineered safety feature of plant protection system that causes or threatens to cause the feature or system to be incapable of performing its intended function.
- e. Abnormal degradation of one of the several boundaries designed to contain the radioactive materials resulting from the fission process.
- f. Uncontrolled or unanticipated changes in reactivity equal to or greater than $1\% \Delta k/k$. | Change
No. 111
- g. Observed inadequacies in the implementation of administrative or procedural controls such that the inadequacy causes or threatens to cause the existence or development of an unsafe condition in connection with the operation of the plant, and
- h. Conditions arising from natural or offsite manmade events that affect or threaten to affect the safe operation of the plant.

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DESCRIPTION: Ltr notarized 7-31-75 trans
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ENCLOSURES:

Proposed Amdt to OL/change to
Tech Specs consisting of revised pages that would
require an annual enviro radiological report in-
stead of the present semi-annual report.....

40 copies encl rec'd

PLANT NAME: Yankee Rowe

FOR ACTION/INFORMATION

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