

ATTACHMENT 2

**REPLACEMENT PAGES 3/4.8-2, 6-2, 6-3, 6-5, 6-6, AND 6-11 OF
TECHNICAL SPECIFICATIONS**

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3.8 - LIMITING CONDITIONS FOR REQUIRED EQUIPMENT

PLANT SYSTEMS

J. Liquid Radioactive Storage

The maximum amount of radioactivity in liquid storage in all Dresden Station's above grade tanks shall not exceed 90 curies. All tanks located within the seismic portion of the Chemical Cleaning Building are not considered above grade storage.

APPLICABILITY:

At all times.

ACTION:

With the quantity of radioactive material in the tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tanks and within 48 hours reduce the tank contents to within the limit by recycling the stored liquid to below grade tanks.

4.8 - SURVEILLANCE REQUIREMENTS

J. Liquid Radioactive Storage

A sample from each of the above grade liquid waste tanks shall be taken, analyzed, and recorded every 7 days. If no additions to a tank have been made since the last sample, the tank need not be sampled until the next addition.

ADMINISTRATIVE CONTROLS

6.2 ORGANIZATION

6.2.A Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safe storage of the irradiated fuel.

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Manual.
2. The Unit 1 Decommissioning Plant Manager shall have overall responsibility for Unit 1 and shall have control over those Unit 1 activities necessary for operation and maintenance of structures and systems necessary for the safe storage of irradiated fuel.
3. A Corporate Vice President shall have corporate responsibility for the safe storage of irradiated fuel and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure the safe storage of irradiated fuel.
4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

ADMINISTRATIVE CONTROLS

6.2.B UNIT STAFF

The Unit Staff organization shall be as follows:

1. One of the non-licensed operators required for Unit 2/3 shall be assigned responsibility for Unit 1 while fuel is stored in the Unit 1 Fuel Storage Pool.
2. One of the persons qualified to stand watch in the Unit 2/3 control room shall be assigned responsibility for Unit 1 while irradiated fuel is stored in the Unit 1 Fuel Storage Pool.
3. An individual qualified in radiation protection procedures shall be on-site and assigned to Unit 1 during Unit 1 fuel handling operations.
4. All fuel handling operations shall be directly supervised by a Qualified Unit 1 Supervisor.^(a)
5. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform operations on the Unit 1 irradiated fuel. e.g, Qualified Unit 1 Supervisor, health physicists, auxiliary operators, key maintenance personnel and fuel handlers.

The amount of overtime worked by unit staff members who perform work on Unit 1 irradiated fuel shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).

6. The Unit 2/3 Operations Manager or Unit 2/3 Shift Operations Supervisor shall hold a Unit 2/3 Senior Reactor Operator License.

6.2.C SHIFT TECHNICAL ADVISOR - {DELETED}

(a) A Qualified Unit 1 Supervisor is a person who has a valid Senior Reactor Operators License on Units 2(3), (SRO or SRO-L) or a person certified to an approved training program as a Qualified Unit 1 Supervisor.

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

6.8.A Written procedures shall be established, implemented, and maintained covering the activities referenced below:

1. The procedures applicable to the safe storage and handling of irradiated fuel recommended in Appendix A, of Regulatory Guide 1.33, Revision 2, February 1978;
2. Emergency Operating Procedures, - {DELETED}
3. Station Security Plan implementation,
4. Generating Station Emergency Response Plan implementation,
5. PROCESS CONTROL PROGRAM (PCP) implementation,
6. OFFSITE DOSE CALCULATION MANUAL (ODCM) implementation,
7. Fire Protection Program implementation, and
8. Winterization Program applicable to the safe storage and handling of irradiated fuel.

6.8.B {DELETED}

6.8.C {DELETED}

6.8.D The following programs shall be established, implemented, and maintained:

1. Reactor Coolant Sources Outside Primary Containment - {DELETED}
2. In-Plant Radiation Monitoring - {DELETED}
3. Post Accident Sampling - {DELETED}

ADMINISTRATIVE CONTROLS

4. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by station procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and set-point determination in accordance with the methodology in the ODCM,
- b. Limitations on the instantaneous concentrations of radioactive material released in liquid effluents to unrestricted areas conforming to ten (10) times the concentration values in 10 CFR Part 20, Appendix B, Table 2, Column 2 to 10 CFR Part 20.1001 - 20.2402,
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,
- d. Limitations on the annual and quarterly doses to a member of the public from radioactive materials in liquid effluents released from each Unit conforming to Appendix I to 10 CFR Part 50,
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- f. Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose conforming to Appendix I to 10 CFR Part 50,

ADMINISTRATIVE CONTROLS

6.12.B In addition to the requirements of 6.12.A, areas accessible to personnel with radiation levels greater than 1000 mrem/hr at 30 cm (12 in.) from the radiation source or from any surface which the radiation penetrates shall require the following:

1. Doors shall be locked to prevent unauthorized entry and shall not prevent individuals from leaving the area. In place of locking the door, direct or electronic surveillance that is capable of preventing unauthorized entry may be used. The keys shall be maintained under the administrative control of the Shift Manager on duty and/or health physics supervision.
2. Personnel access and exposure control requirements of activities being performed within these areas shall be specified by an approved RWP (or equivalent document).
3. Each person entering the area shall be provided with an alarming radiation monitoring device that continuously integrates the radiation dose rate (such as an electronic dosimeter.) Surveillance and radiation monitoring by a Radiation Protection Technician may be substituted for an alarming dosimeter.
4. {DELETED}
5. For individual HIGH RADIATION AREAS accessible to personnel with radiation levels of greater than 1000 mrem/h at 30 cm (12 in.) that are located within large areas where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual areas, then such individual areas shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.