



Entergy Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213
Tel 601-368-5138

Ron Gaston
Director, Nuclear Licensing

10 CFR 50.90

W3F1-2021-0060

September 30, 2021

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Response to Request for Additional Information Regarding License
Amendment Request to Relocate Chemical Detection Systems Technical
Specifications to Technical Requirements Manual

Waterford Steam Electric Station, Unit 3
NRC Docket No. 50-382
Renewed Facility Operating License No. NPF-38

- References:
- 1) Entergy Operations, Inc. (Entergy) letter to U.S. Nuclear Regulatory Commission (NRC), W3F1-2021-0004, "License Amendment Request to Relocate Chemical Detection Systems Technical Specifications to the Technical Requirements Manual," (ADAMS Accession Number ML21095A156), dated April 5, 2021
 - 2) NRC email to Entergy, "Request for Additional Information Regarding the Waterford Steam Electric Station, Unit 3 License Amendment Request to Relocate the Chemical Detection Systems Technical Specifications to Technical Requirements Manual (EPID L-2021-LLA-0061)," dated August 6, 2021

By letter dated April 5, 2021 (Reference 1), Entergy Operations Inc. (Entergy) requested an amendment to Appendix A, "Technical Specifications," of Renewed Facility Operating License No. NPF-38 for Waterford Steam Electric Station, Unit 3 (Waterford 3) to relocate the Chemical Detection Systems Technical Specifications (TSs) to the Technical Requirements Manual (TRM). Specifically, the TSs to be relocated are TS 3.3.3.7.1, "Chlorine Detection System," TS 3.3.3.7.3, "Broad Range Gas Detection," and TS Surveillance Requirement (SR) 4.7.6.1.d.4.

The U.S. Nuclear Regulatory Commission (NRC) informed Entergy that they have reviewed the license amendment request and determined that additional information is required to complete the review. On August 6, 2021, a draft request for additional information (RAI) was provided (Reference 2) and a clarification call between the NRC and Entergy was held on August 16, 2021 regarding the draft RAI.

The responses to the NRC's RAI are provided in the Enclosure to this letter. The responses do not affect the no significant hazards consideration provided in the original license amendment request (Reference 1). In addition, during preparation of the RAI response, it was noted that License Condition 2.C.4 of the Waterford 3 Renewed Facility Operating License currently requires the Broad Range Toxic Gas Detection System to be added to the Waterford 3 TSs (i.e., Appendix A to the License). The relocation of TS 3.3.3.7.3, "Broad Range Gas Detection," to the TRM contradicts the action to be taken as specified in the License Condition since the corresponding TS will no longer reside in Appendix A to the Waterford 3 Operating License. NRC approval of the relocation of TS 3.3.3.7.3 to the TRM will effectively result in License Condition 2.C.4 no longer being applicable. A supplement to the original license amendment request letter (Reference 1) will be submitted under a separate cover letter to delete License Condition 2.C.4 as a conforming change.

This letter contains no new regulatory commitments.

In accordance with 10 CFR 50.91, Entergy is notifying the State of Louisiana of this supplemental information by transmitting a copy of this letter and Enclosure to the designated State official.

Should you have any questions or require additional information, please contact Paul Wood, Waterford 3 Regulatory Assurance Manager, at 504-464-3786.

I declare under penalty of perjury; the foregoing is true and correct.
Executed on September 30, 2021.

Respectfully,



Ron Gaston

RWG/wjs/cdm

Enclosure: Response to Request for Additional Information Regarding Relocation of
Chemical Detection Systems Technical Specifications to Technical Requirements
Manual

cc: NRC Region IV Regional Administrator
NRC Senior Resident Inspector – Waterford 3
NRC Project Manager Waterford 3
Louisiana Department of Environmental Quality, Office of Environmental Compliance

Enclosure

W3F1-2021-0060

**Response to Request for Additional Information Regarding Relocation of Chemical
Detection Systems Technical Specifications to Technical Requirements Manual**

Response to Request for Additional Information Regarding Relocation of Chemical Detection Systems Technical Specifications to Technical Requirements Manual

By letter dated April 5, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21095A156), Entergy Operations, Inc (Entergy or the licensee) submitted a license amendment request (LAR or application) to revise Waterford Steam Electric Station, Unit 3 (Waterford 3) Technical Specifications (TS) to remove TSs 3.3.3.7.1 and 3.3.3.7.3, "Chemical Detection Systems" and references to the TS, and relocate the information to the licensee controlled Technical Requirements Manual (TRM). The TRM is part of the Final Safety Analysis Report (FSAR) and any changes to the TRM are subject to the criteria of 10 CFR 50.59. Additionally, the proposed change will relocate Surveillance Requirement (SR) 4.7.6.1.d.4 to the TRM.

Request for Additional Information (RAI) 1

The discussion in Section 3.0, "Technical Evaluation," of the Enclosure to the license amendment request links the statement that the chlorine and broad range detection systems do not function or actuate to mitigate a design basis accident [or transient that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier] with the lack of credit for the functions of the chemical detection systems in Chapter 15, "Accident Analyses," of the Waterford 3 Final Safety Analysis Report (FSAR). However, Section 2.2.3, "Evaluation of Potential Accidents," of the Waterford 3 FSAR states that the hazards associated with chemicals transported or stored in the vicinity of Waterford 3 were evaluated and the main control room design prevents the incapacitation of control room operators during toxic gas episodes. In addition, Section 2.2.3.3, "Design Basis Toxic Chemicals," of the Waterford 3 FSAR includes the following statements: "...the probability that toxic chemicals frequently transported in the vicinity of Waterford 3 could cause a radiological release in excess of 10 CFR 50.67 guidelines is 6.45×10^{-7} per year," and "Since the probability is below the 10^{-6} per year criterion, the results indicate that the protective features described in the FSAR provide adequate protection for the control room operators." Please explain how Entergy considered the information discussed in Section 2.2.3 of the Waterford 3 FSAR in determining the applicability of Criterion 3 of 10 CFR 50.36(c)(2)(ii) to TS 3.3.3.7.1, "Chlorine Detection System," and TS 3.3.3.7.3, "Broad Range Gas Detection."

Response:

The current Title 10 of the Code of Federal Regulations (10 CFR) 50.36(c)(2)(ii) criteria were part of a rule change described in 58 Federal Register (FR) 39132, "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," (Reference 1) and codified in 60 FR 36953, "Technical Specifications," (Reference 2). The final 10 CFR 50.36(c)(2)(ii)(C) Criterion 3 rule is (emphasis added):

"A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a **Design Basis Accident or Transient** that either assumes the failure of or presents a challenge to the integrity of a fission product barrier."

The final policy statement explicitly defined which design basis accident or transients were applicable to 10 CFR 50.36(c)(2)(ii)(C) Criterion 3. The final policy statement discussion of 10 CFR 50.36(c)(2)(ii)(B) Criterion 2 explicitly defined what are considered design basis

accident and transient analyses. The following is the information from the discussion of Criterion 2 (emphasis added):

"Another basic concept in the adequate protection of the public health and safety is that the plant shall be operated within the bounds of the initial conditions assumed in the existing **Design Basis Accident and Transient analyses** and that the plant will be operated to preclude unanalyzed transients and accidents. The analyses consist of postulated events analyzed in the FSAR, for which a structure, system, or component must meet specified functional goals.

These analyses are contained in Chapters 6 and 15 of the FSAR (or equivalent chapters) and are identified as Condition II, III, or IV events (ANSI N18.2) (or equivalent) that either assume the failure of or present a challenge to the integrity of a fission product barrier."

The final policy statement provides the following further discussion of design basis accident and transient analyses under Criterion 3 (emphasis added):

"A third concept in the adequate protection of the public health and safety is that in the event that a postulated **Design Basis Accident or Transient** should occur, structures, systems, and components are available to function or to actuate in order to mitigate the consequence of the **Design Basis Accident or Transient**. Safety sequence analyses or their equivalent have been performed in recent years and provide a method of presenting the plant response to an accident. These can be used to define the primary success paths.

A safety sequence analysis is a systematic examination of the actions required to mitigate the consequences of events considered in the plant's **Design Basis Accident and Transient analyses, as presented in Chapters 6 and 15 of the plant's FSAR (or equivalent chapters)**. Such a safety sequence analysis considers all applicable events, whether explicitly or implicitly presented. The primary success path of a safety sequence analysis consists of the combination and sequences of equipment needed to operate (including consideration of the single failure criteria), so that the plant response to **Design Basis Accidents and Transients** limits the consequences of these events to within the appropriate acceptance criteria.

It is the intent of this criterion to capture into Technical Specifications only those structures, systems, and components that are part of the primary success path of a safety sequence analysis. Also captured by this criterion are those support and actuation systems that are necessary for items in the primary success path to successfully function. The primary success path for a particular mode of operation does not include backup and diverse equipment (e.g., rod withdrawal block which is a backup to the average power range monitor high flux trip in the startup mode, safety valves which are backup to low temperature overpressure relief valves during cold shutdown)."

Thus, to specifically address the first part of RAI 1, which states:

"The discussion in Section 3.0, 'Technical Evaluation,' of the Enclosure to the license amendment request links the statement that the chlorine and broad range detection systems do not function or actuate to mitigate a design basis accident [or transient that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier] with the lack of credit for the functions of the chemical detection systems in

Chapter 15, 'Accident Analyses,' of the Waterford 3 Final Safety Analysis Report (FSAR). However, Section 2.2.3, 'Evaluation of Potential Accidents,' of the Waterford 3 FSAR states that the hazards associated with chemicals transported or stored in the vicinity of Waterford 3 were evaluated and the main control room design prevents the incapacitation of control room operators during toxic gas episodes....Please explain how Entergy considered the information discussed in Section 2.2.3 of the Waterford 3 FSAR in determining the applicability of Criterion 3 of 10 CFR 50.36(c)(2)(ii) to TS 3.3.7.1, 'Chlorine Detection System,' and TS 3.3.7.3, 'Broad Range Gas Detection' [sic]."

Chapter 2 of the Waterford 3 Updated Final Safety Analysis Report (UFSAR) provides the site characteristics, and Section 2.2.3 describes external accidents that are due to the location of the site. The UFSAR Section 2.2.3 analyses of the external events are not included in UFSAR Chapter 6 or 15. The design requirements for toxic gas protection are described in UFSAR Chapter 6 but the event analyses are contained in UFSAR Chapter 2. Since the UFSAR Chapter 2 event analyses are not included in UFSAR Chapter 6 or 15, they do not apply to 10 CFR 50.36(c)(2)(ii)(C) Criterion 3. This position is consistent with U.S. Nuclear Regulatory Commission (NRC) Generic Letter 95-10, "Relocation of Selected Technical Specifications Requirements Related to Instrumentation," (Reference 3) and is further described below.

NRC Generic Letter 95-10 was issued shortly after the 10 CFR 50.36 Final TS Rule change (Reference 2) and included the generic basis for relocation of the chlorine detection system (toxic gas detection system) and why the system does not meet the 10 CFR 50.36(c)(2)(ii) criteria. The Generic Letter describes instrumentation that does not meet the four criteria of 10 CFR 50.36(c)(2)(ii) and explicitly addresses the chlorine detection systems and toxic gas detection systems. Attachment 1 to NRC Generic Letter 95-10 provides the following guidance under the heading, "Chlorine Detection System," (emphasis added):

"Chlorine detection systems ensure that sufficient capability is available to promptly detect and initiate protective action to isolate the control room in the event of an accidental chlorine release. Some plants may also have systems to detect other toxic gases that have the potential to hamper plant operation in the case of their accidental release from onsite or offsite sources. **This discussion of the typical chlorine detection systems also applies to the relocation of TSs related to other toxic gas detection systems.** Staff positions regarding the relationship of the chlorine detection systems to the general design criteria (GDC) appear in NUREG-0800, "Standard Review Plan" (SRP); Regulatory Guide (RG) 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release"; and RG 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release."

As discussed above, chlorine detection systems may serve an important role in protecting control room personnel from internal or external hazards related to toxic gases. However, **the release of chlorine or other hazardous chemicals is not part of an initial condition of a design basis accident or transient analysis that assumes a failure of or presents a challenge to the integrity of a fission product barrier.** Since the release of toxic gases is not assumed to initiate or occur simultaneously with design basis accidents or transients involving challenges to fission product barriers, the chlorine detection system is not part of a success path for the mitigation of those accidents or transients. **The staff has, therefore, concluded that requirements for this system do not meet the 10 CFR 50.36 criteria and need not be included in TSs. Licensees may propose to relocate the chlorine detection**

system requirements to the UFSAR and control changes to those provisions in accordance with 10 CFR 50.59."

The TS 3.3.3.7.1, "Chlorine Detection System," requirements were originally included in the Waterford 3 TSs consistent with NUREG-0212, "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors," (Reference 4). The TS 3.3.3.7.3, "Broad Range Gas Detection," requirements were added to the Waterford 3 TSs in License Amendment No. 20 (Reference 5) in accordance with License Condition 2.C.4 of the Waterford 3 Renewed Facility Operating License and due to the need for an additional reliable diverse means of toxic gas detection. In a subsequent action, the NRC authorized relocation of the "Chloride Detection Systems," from the Combustion Engineering Standard Technical Specifications (CE-STS) as requested in CE Owners Group letter CEN-355 (Reference 6) and approved in a letter to the Babcock and Wilcox (B&W) Owners Group (Reference 7). Specifically, in Appendix C, Table 2, of the B&W Owners Group letter, the NRC listed the CE-STS Limiting Conditions for Operation (LCOs) authorized for relocation," and the list included the "Chloride Detection Systems." In Section 3 of the B&W Owners Group letter, "Results of the Staff's Review," the NRC addressed LCOs unique to an Owners Group STS (e.g., a plant-specific TS LCO) that were not specifically identified in Table 2 for relocation. In the discussion, the NRC provided direction to retain the LCO in the STS until the Owners Group proposes and the staff makes a specific determination that the LCO can be relocated to a licensee-controlled document. Waterford 3 TS 3.3.3.7.3, "Broad Range Gas Detection," falls under this provision and the relocation of the TS requested in letter W3F1-2021-0004 (Reference 8) is consistent with the intent of the provision.

The second part of RAI 1 states:

"In addition, Section 2.2.3.3, 'Design Basis Toxic Chemicals,' of the Waterford 3 FSAR includes the following statements: '...the probability that toxic chemicals frequently transported in the vicinity of Waterford 3 could cause a radiological release in excess of 10 CFR 50.67 guidelines is 6.45×10^{-7} per year,' and 'Since the probability is below the 10^{-6} per year criterion, the results indicate that the protective features described in the FSAR provide adequate protection for the control room operators.' Please explain how Entergy considered the information discussed in Section 2.2.3 of the Waterford 3 FSAR in determining the applicability of Criterion 3 of 10 CFR 50.36(c)(2)(ii) to TS 3.3.7.1, 'Chlorine Detection System,' and TS 3.3.7.3, 'Broad Range Gas Detection' [sic]."

The second part of RAI 1 is using the probabilistic risk analysis (PRA) insights from UFSAR Section 2.2.3 and the relationship to 10 CFR 50.67 to draw a tie to the integrity of the fission product barrier. The probability of occurrence of toxic chemicals causing a radiological release is presented in Section 2.2.3 of the Waterford 3 UFSAR consistent with NUREG-0800 Section 2.2.3, "Evaluation of Potential Accidents," (Reference 9). Consistent with the discussion in the final policy statement for 10 CFR 50.36 (Reference 1), it may be concluded that 10 CFR 50.36(c)(2)(ii)(C) Criterion 3 is based upon the deterministic UFSAR Chapter 6 and 15 analyses and the PRA insights fall under 10 CFR 50.36(c)(2)(ii)(D) Criterion 4. The final policy statement discussion follows (emphasis added):

"Some commenters stated that if PSA is used to impose Technical Specifications for some high-risk items, it should also be used to remove some low-risk items. The Commission notes that this approach to Technical Specifications has been considered at length during the development of the Policy Statement. **Since the first three criteria in the Policy Statement are derived from the plant safety analysis report which is deterministic in nature,** (but which itself incorporates qualitative risk insights) the

Commission believes that a broad application of PSA to remove individual requirements from Technical Specifications is generally counter to the philosophy of the first three criteria. However, risk insights were used to determine the values of some completion times and surveillance frequencies for items retained in the improved STS."

Thus, the PRA insights do not apply to 10 CFR 50.36(c)(2)(ii)(C) Criterion 3. The PRA risk insights discussed in UFSAR Subsection 2.2.3.3.6 involving the probability that toxic chemicals could pose a potential hazard to the Waterford 3 control room personnel were addressed with respect to 10 CFR 50.36(c)(2)(ii)(D) Criterion 4 in the original license amendment request letter, W3F1-2021-0004, (Reference 8), and it was concluded that neither the Chlorine Detection System nor the Broad Range Gas Detection System satisfy Criterion 4. Note that the probability that toxic chemicals frequently transported in the vicinity of Waterford 3 could cause a radiological release in excess of 10 CFR 50.67 guidelines was revised from 6.45×10^{-7} per year to 6.70×10^{-7} per year in Revision 312 of the Waterford 3 UFSAR. This is the UFSAR update identified in Reference 9 of letter W3F1-2021-004 and incorporated per License Basis Document Change Request (LBDCR) 20-024.

In conclusion, the UFSAR Section 2.2.3 analyses of the external events crediting the chlorine detection system (toxic gas detection system) are not included in UFSAR Chapter 6 or 15. Accordingly, since the UFSAR Chapter 2 event analyses are not included in UFSAR Chapter 6 or 15, the associated mitigating functions provided by TS 3.3.3.7.1, "Chlorine Detection System," and TS 3.3.3.7.3, "Broad Range Gas Detection," are not considered to be a primary success path which functions or actuates to mitigate a Design Basis Accident. As such, TS 3.3.3.7.1 and TS 3.3.3.7.3 do not meet the requirement of 10 CFR 50.36(c)(2)(ii)(C) Criterion 3 to be included in the TSs and may be relocated. This is consistent with the final policy statement for 10 CFR 50.36 (Reference 1), the previous NRC guidance given in NRC Generic Letter 95-10 (Reference 3), and the results of the NRC's evaluation of CE Owners Group letter CEN-355 (Reference 6) provided in the B&W Owners Group letter (Reference 7).

RAI 2

"Surveillance requirements are defined in 10 CFR 50.36(c)(3) as those requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met. SR 4.7.6.1.d.4 verifies that upon a toxic gas detection signal (chlorine and broad range gas detection systems), the control room emergency filtration system automatically switches to the isolation mode of operation. Please explain how relocation of Surveillance Requirement (SR) 4.7.6.1.d.4 was assessed relative to ensuring the necessary quality of the control room emergency air filtration system actuation instrumentation would be maintained and the impacts it would have on all related limiting conditions for operation."

Response:

Surveillance Requirement (SR) 4.7.6.1.d.4 states the following:

"Verifying that on a toxic gas detection signal, the system automatically switches to the isolation mode of operation, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position in Modes 5, 6, or defueled."

As indicated, the purpose of SR 4.7.6.1.d.4 is to verify the function of the toxic gas detection signal. As described in letter W3F1-2021-0004 (Reference 8) and the response to RAI 1 (above), the toxic gas detection system does not meet the requirement of 10 CFR 50.36(c)(2)(ii)(C) Criterion 3 to be included in the TSs and, therefore, the limiting conditions for operation and surveillances meet the requirements to be relocated. The relocation of SR 4.7.6.1.d.4 does not mean that it is no longer required. The Waterford 3 licensing basis still includes Regulatory Guide 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," (Reference 10) as described in UFSAR Subsections 1.8.1.78, 1.9.39, and 2.2.3.3, and Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release," (References 11 and 12) as described in UFSAR Subsections 1.8.1.95, 1.9.39, 2.2.3.3, 6.4.2.3, 6.4.4.2, and 14.2.7.18. Thus, the Waterford 3 UFSAR evaluates toxic gas events as required and the safety-related function of the toxic gas detection signal is still a requirement. Accordingly, ensuring that on a toxic gas detection signal, the system automatically switches to the isolation mode of operation will remain part of the Waterford 3 design and licensing basis requirements.

No physical changes are being made to the plant as part of this relocation. The physical plant controls will not be changed and the quality of the instrumentation will not be changed. The safety-related function for the control room emergency filtration system to automatically switch to the isolation mode of operation will still be tested by SR 4.7.6.1.d.2 and the SR will still verify the safety injection actuation test signal and high radiation test signal functions as required for operability of the system.

The statements of consideration in the 10 CFR 50.36 Final TS Rule (Reference 2) include the following NRC response to a comment concerning a potential decrease in licensee attention to safety due to TS relocations (emphasis added):

"One commenter stated that the removal of items from plant technical specifications may decrease enforceability and licensee attention to safety.

The Commission does not agree that the removal of items from plant technical specifications will decrease licensee attention to safety. On the contrary, the Commission believes that implementation of the criteria contained in this rule will produce an improvement in the safety of nuclear power plants through the use of more operator-oriented technical specifications, improved technical specification bases, reduced action statement induced plant transients, and more efficient use of NRC and industry resources. Clarification of the scope and purpose of technical specifications has provided useful guidance to both the NRC and industry and has resulted in improved technical specifications that are intended to focus licensee and plant operator attention on those plant conditions most important to safety."

The statement in the Final TS Rule that removal of items from the TSs will not decrease the licensee attention to safety is aligned with the intent of this relocation. The quality of the control room emergency air filtration system actuation instrumentation will not be changed by this relocation and it has no impact on the associated limiting conditions for operation.

References

1. U.S. Nuclear Regulatory Commission (NRC) "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," Federal Register, 58 FR 39132, dated July 22, 1993
2. NRC Final Rule, 10 CFR 50.36, "Technical Specifications," Federal Register, 60 FR 36953, dated July 19, 1995
3. NRC Generic Letter 95-10, "Relocation of Selected Technical Specifications Requirements Related to Instrumentation," (ADAMS Accession Number ML031070178), dated December 15, 1995
4. NRC NUREG-0212, "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors," Revision 3, (ADAMS Accession No. ML20049K081), dated March 1, 1982
5. NRC letter to Louisiana Power and Light Company, "Issuance of Amendment No. 20 to Facility Operating License NPF-38 – Waterford Steam Electric Station, Unit 3 (TAC No. 64636)," (ADAMS Accession Number ML021750641), dated July 21, 1987
6. Letter CEOG-87-735 from Combustion Engineering Owners Group (CEOG) to NRC, "CEN-355, 'C-E Owners Group Restructured Standard Technical Specifications' – Volume 1," (ADAMS Accession Number ML20237B697), dated December 11, 1987
7. NRC letter to B&W Owners Group, "NRC Staff Review of Nuclear Steam Supply System Vendor Owner Groups' Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications," (ADAMS Accession Number ML11264A057), dated May 9, 1988
8. Entergy Operations, Inc. (Entergy) Letter W3F1-2021-0004 to NRC, "License Amendment Request to Relocate Chemical Detection Systems Technical Specifications to the Technical Requirements Manual," (ADAMS Accession Number ML21095A156), dated April 5, 2021
9. NRC NUREG-0800 Standard Review Plan, Section 2.2.3, "Evaluation of Potential Accidents," Revision 2, (ADAMS Accession No. ML052340562), dated July 31, 1981
10. NRC Regulatory Guide 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," (ADAMS Accession No. ML003740298), dated June 30, 1974
11. NRC Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release," dated February 1975
12. NRC Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release," Revision 1, (ADAMS Accession No. ML12298A134), dated January 31, 1977