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Posted
Correction to
Amdt. 70
to DPR-26

Docket Nos. 50-3
and 50-247

JUN 01 1981

Mr. John D. O'Toole
Vice President
Nuclear Engineering and Quality Assurance
Consolidated Edison Company of
New York, Inc.
4 Irving Place
New York, New York 10003

Dear Mr. O'Toole:

On April 24, 1981, the Commission issued Amendment Nos. 30 and 70 to Operating License Nos. DPR-5 and DPR-26 for the operation of Indian Point Nuclear Generating Units Nos. 1 and 2. The amendments revised the Appendix B Environmental Technical Specifications to delete non-radiological environmental requirements, and to add a non-radiological environmental protection plan.

The instruction sheets to the amendments were in error in that they were misleading as to removal of certain pages, resulting in pages remaining in the TS which should have been removed. Also, two pages which should have been included were inadvertently omitted.

In order to properly correct the TS as intended, enclosed is a new instruction sheet corrected for removal of pages, together with a set of TS pages to be inserted including the missing pages 5.6-2 and 5.6-3.

Please accept our apologies for any inconvenience this error may have caused.

Sincerely,

Original signed by:
S. A. Varga

Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Enclosures:
Corrected instruction
sheet and TS pages

cc: w/enclosures

OFFICE	See next page	ORB 1	ORB 1	ORB 1
SURNAME		<i>emb</i>	L. Olshan/rs	S. Varga
DATE		5/22/81	5/23/81	5/22/81

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ATTACHMENT TO LICENSE AMENDMENT NOS. 30 AND 70

PROVISIONAL OPERATING LICENSE NO. DPR-5

FACILITY OPERATING LICENSE NO. DPR-26

DOCKET NOS. 50-3 AND 50-247

Revise Appendix B as follows:

Remove Pages

Cover Sheet

i through v

1-1 through 1-6

2.1-1 through 2.1-13

2.2-1 through 2.2-6

2.3-1 through 2.3-22

4.1-1

4.1-9 through 4.1-38

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Insert Pages

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5-1 through 5-4

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1.0 DEFINITIONS

Definitions 1-1 through 1.13 - Deleted

Applicability

Applies to the controlled release of radioactive liquid, gaseous waste effluents and solid waste from the Indian Point Station.

Objective

To define the conditions for controlled release of radioactive liquids to the Hudson River and radioactive gases to the atmosphere in order to assure compliance with applicable Federal regulations.

2.1 TERMINAL

Deleted

Applicability

Applies to routine sampling and analysis of the Station effluents and to an analytical evaluation of the data collected from the environmental monitoring survey.

Objective

To establish a sampling and analysis program which will assure that all effluents are kept within applicable Federal regulations.

3.1 TERMINAL

Deleted

1.0 DEFINITIONS

1.14 Deleted

1.15 Deleted

1.16 Maximum Permissible Concentration (MPC) - is that concentration of a radionuclide according to 10 CFR Part 20, Appendix B, Table II in air (MPC_a) or water (MPC_w).

1.17 Deleted

1.18 The design of the shared liquid radioactive waste treatment system at the Indian Point Units Nos. 1, 2 and 3 precludes monitoring the actual release rates per reactor as specified in Specifications 2.4 b, 2.4.1.b, 2.4.1.c, 2.4.1.f and 2.4.1.h. The release rate per site shall be equal to the release rate per reactor times the number of reactors producing radioactive effluents at the site irrespective of the actual release rate from each reactor through the shared liquid radioactive waste treatment system.

References

Deleted

2.0 LIMITING CONDITIONS

3.0 MONITORING REQUIREMENTS

2.0 LIMITING CONDITIONS FOR OPERATION

3.0 MONITORING REQUIREMENTS

2.2 HYDRAULICS OF CIRCULATING WATER SYSTEM (CWS)

3.2 HYDRAULICS OF CIRCULATING WATER SYSTEM (CWS)

Deleted

Deleted

2.0 LIMITING CONDITIONS FOR OPERATION

3.0 MONITORING REQUIREMENTS

2.3

CHEMICAL

Deleted

3.3 CHEMICAL

Deleted

4.0 ENVIRONMENTAL SURVEILLANCE PROGRAMS

4.1 NONRADIOLOGICAL ENVIRONMENTAL SURVEILLANCE

4.1.1.a Thermal Plume Mapping

Deleted

4.0 ENVIRONMENTAL SURVEILLANCE AND SPECIAL STUDIES

4.1.2 Deleted

Amendment No. 30, Unit 1
Amendment No. 70, Unit 2

5.0 ADMINISTRATIVE CONTROLS

Objective

To establish the administrative controls that relate to management procedures, record keeping and reporting that are considered necessary to provide the assurance and evidence that the Plant will be managed as prescribed by the Environmental Technical Specifications and will be operated to provide continuing protection of the environment.

Specifications

- 5.1 Organization and Responsibilities, Review and Audit
- 5.1.1 Organization and Responsibilities
- 5.1.1.1 The ultimate responsibility for the implementation of these Environmental Technical Specifications shall reside with the corporate officers of Consolidated Edison Company of New York, Inc. The corporate and Station level organization charts are shown in Section 6.0 of Appendix A.
- 5.1.1.2 The Department Manager shall have direct responsibility for the safe operation and maintenance of all facilities comprising Indian Point Station, Units 1 & 2, and to assure that the limiting conditions of operation as noted in the Environmental Technical Specifications as defined herein are not exceeded. This responsibility shall be expressly delegated to a specified member of the Station management staff during any off-duty status period of the Department Manager. The Department Manager shall report to the Vice President, Nuclear Power Generation.
- 5.1.1.3 The Division Chemist shall report via the Chief Chemical Engineer and General Manager, Power Generation Services to the Senior Vice President, Power Generation and either he, or his designee, has primary responsibility for the conduct of the radiological environmental monitoring program.

5.0 ADMINISTRATIVE CONTROLS

5.1 Specifications (Cont'd)

5.1.1.4 The environmental surveillance programs will be performed by the licensee's staff and/or through contractual arrangement between the licensee and its contractors. The immediate responsibility for the review and updating of each program lies with the Division Chemist.

5.1.1.5 Any change in the corporate organization and responsibilities described in this Section (5.1.1) and Section 5.2, 5.3 and 5.4 shall be reported to the Director of the Office of Nuclear Reactor Regulation within 30 days of its effective date and the implementation of any such change shall not be deemed a violation of an environmental technical specification.

5.1.2 Review and Audit

- (a) The Nuclear Facility Safety Committee (NFSC), as described in Section 6.0 of Appendix A, shall have the responsibility to perform the review and audit of the radiological environmental monitoring program.
- (b) The NFSC shall review the results of the radiological portion of each Annual Environmental Operating Report prior to submission of the report to the NRC. See Section 5.6.1.1.

5.0 ADMINISTRATIVE CONTROLS

5.2

Action to be Taken in the Event of A Nonroutine Reportable
Environmental Occurrence

Section 5.2 - Deleted

5.0 ADMINISTRATIVE CONTROLS

5.3 : Action to be Taken Prior to Special Tests or Changes

Section 5.3 - Deleted

5.0 ADMINISTRATIVE CONTROLS

5.4 Operating Procedures and Environmental Surveillance Programs

5.4.1 Operating Procedures, Content and Review

5.4.1.1 Operating Procedures

Detailed written procedures including check-off lists and instructions, where applicable, shall be prepared, approved and adhered to for the following activities involved in carrying out Section 2 and 3 of the ETSR:

5.4.1.1.1 Releases of radioactivity from the site.

5.4.1.1.2 All radiological environmental sampling.

5.4.1.1.3 Calibration of various instruments used in measuring and analyzing the samples which are required by these specifications.

5.4.1.1.4 Data recording, storage, measurements and analysis.

5.4.1.2 Content

Operating procedures, required by Section 5.4.1.1, shall include provisions to ensure the plant and all its systems and components are operated in compliance with the limiting conditions for operation established as part of the ETSR.

5.4.1.3 Review

5.4.1.3.1 All operating procedures, required by Section 5.4.1.1, will be reviewed by the Station Nuclear Safety Committee, or their designee, as set forth in Section 6.0 of Appendix A, Technical Specifications.

5.4.1.3.2 All changes to operating procedures required by these ETSR will be reviewed and approved by the Chief Operations Engineer if they affect plant operations.

5.0 ADMINISTRATIVE CONTROLS

5.4 Specifications (Cont'd)

5.4.2 Environmental Surveillance Programs, Content and Review

5.4.2.1 Environmental Surveillance Programs

Program shall be prepared for each environmental surveillance program involved in carrying out Section 4 of the ETSR.

5.4.2.2 Content

Programs, required by Section 5.4.2.1, shall include provisions and a list of procedures to ensure that the environmental surveillance program is conducted in compliance with the requirements of the ETSR as set forth in Section 4.

5.4.2.3 Review

5.4.2.3.1 All programs, required by Section 5.4.2.1, will be reviewed and audited by the Nuclear Facilities Safety Committee, or its designee, as set forth in Section 6.0 of Appendix A, Technical Specifications.

5.0 ADMINISTRATIVE CONTROLS

5.5 Record Retention

5.5.1 Record Retention - 5 years

Records and/or logs relative to the following items shall be kept in a manner convenient for review and retained for five years:

- 5.5.1.1 Records of normal plant operation, including power levels and period of operation at each power level.
- 5.5.1.2 Records of principal maintenance activities, including repair, substitution or replacement of principal items of equipment pertaining to environmental impact.
- 5.5.1.3 Records of occurrences involving violation of Environmental Technical Specifications.
- 5.5.1.4 Records of periodic checks, inspections and calibration performed to verify that environmental surveillance requirements are being met.
- 5.5.1.5 Records of any special operational modes (tests or experiments) affecting environmental impact.
- 5.5.1.6 Records of changes made to procedures, equipment, permits and certificates affecting environmental impact.
- 5.5.1.7 Records of changes to operating procedures affecting environmental impact.

5.5.2 Record Retention - Life of Plant

Records relative to the following items shall be kept in a manner convenient for review and retained for the life of the plant:

- 5.5.2.1 Reports of all environmental monitoring surveys, and special surveillance and study activities required by the ETSR in Section 4.0.
- 5.5.2.2 Records and drawing detailing plant design changes and modifications made to system and equipment as described in Section 5.3.2.

5.0 ADMINISTRATIVE CONTROLS

5.6 Plant Reporting Requirements

5.6.1 Routine Reports

5.6.1.1 Annual Environmental Operating Reports

Radiological Report:

A report on the radiological environmental surveillance programs for the previous 12 months of operation shall be submitted to the Director of the Region I Office of Inspection and Enforcement (with copies to the Director of the Office of Nuclear Reactor Regulation) as a separate document within 120 days after January 1 of each year. The report shall include summaries, interpretations, and statistical evaluation of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous environmental surveillance reports and an assessment of the observed impact of the plant operation on the environment.

Results of all radiological environmental samples taken shall be summarized on an annual basis following the format of Table 5.6-1. In the event that some results are not available within the 120-day period, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

5.6.1.2 Special Environmental Operating Reports

Radiological Report:

A report on the radioactive discharges released from the site during the previous twelve (12) months of operation shall be submitted to the Director of the Region I Office of Inspection and Enforcement (with copies to the Director of Office of Nuclear Reactor Regulation) within 60 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the plant following the format of Appendix B of 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 with

5.0 ADMINISTRATIVE CONTROLS

5.6 Specifications (Cont'd)

data summarized on a quarterly basis following the format of Appendix B thereof.

The report shall include a summary of the meteorological conditions concurrent with the release of gaseous effluents during each quarter with data summarized on a quarterly basis following the format of Appendix B Regulatory Guide 1.21. Calculated offsite dose to humans resulting from the release of effluents and their subsequent dispersion in the atmosphere shall be reported as recommended in Regulatory Guide 1.21.

5.6.2 Nonroutine Reports

5.6.2.1 Nonroutine Environmental Operating Reports

A report shall be submitted in the event that: (a) a limiting condition for operation is exceeded (as specified in Section 2.0, "Limiting Conditions for Operation"), or (b) a report level is reached (as specified in Section 4.0, "Environmental Surveillance"). Reports shall be submitted under one of the report schedules described below.

- a. **Prompt Report.** Those events requiring prompt reports within 24 hours by telephone, telegraph, or facsimile transmission to the Director of the Region I Office of Inspection and Enforcement and within 10 days by a written report to the Director of the Region I Office of Inspection and Enforcement (with copies to the Director of Office of Nuclear Reactor Regulation).
- b. **30-Day Report.** Those events not requiring a prompt report shall be reported within 30 days by a written report to the Director of the Region I Office of Inspection and Enforcement (with copies to the Director of Office of Nuclear Reactor Regulation).

5.0 ADMINISTRATIVE CONTROLS

5.6 Specifications (Cont'd)

The reporting schedule for reports concerning limiting conditions for operation and report levels shall be specified in the licensee's technical specifications. Reports concerning unusual or important events shall be reported on the prompt schedule.

Written 10-day and 30-day reports and, to the extent possible, the preliminary telephone, telegraph, or facsimile reports shall (a) describe, analyze, and evaluate the occurrence, including extent and magnitude of the impact, (b) describe the cause of the occurrence, and (c) indicate the corrective action (including any significant changes made in procedures) taken to preclude repetition of the occurrence and to prevent similar occurrences involving similar components or systems.

The significance of an unusual or apparently important event with regard to environmental impact may not be obvious or fully appreciated at the time of occurrence. In such cases, the NRC shall be informed promptly of changes in the licensee's assessment of the significance of the event and a corrected report shall be submitted as expeditiously as possible.

5.6.2.2 Nonroutine Radiological Environmental Operating Report

- a. Anomalous Measurement Report. If, during any yearly report period, a confirmed measured level of radioactivity in any environmental medium exceeds ten times the control station value, a written report shall be submitted to the Director of the Region I Office of Inspection and Enforcement (with copies to the Director of Office of Nuclear Reactor Regulation) within 10 days after confirmation.* This report shall include an

* A confirmatory reanalysis of the original, a duplicate or a new sample may be desirable, as appropriate. The results of the confirmatory analysis shall be completed at the earlier time consistent with the analysis but in any case within 30 days. If the high volume is real, the report to the NRC shall be submitted.

5.0 ADMINISTRATIVE CONTROLS

5.6

Specifications (Cont'd)

evaluation of any release conditions, environmental factors, or other aspects necessary to explain the anomalous result.

b. Milk Pathway Measurements

i. If cow or goat milk samples collected over a calendar quarter show average concentrations of 4.8 picocuries per liter or greater, respectively, a plan shall be submitted within 30 days advising the Director of Office of Inspection and Enforcement of the proposed action to ensure the plant-related annual doses will be within the design objective of 15 mrem/yr to the thyroid of any individual.

ii. When pasture grass is sampled rather than goat milk, if individual pasture grass samples show I-131 concentrations of 0.022 picocuries per gram (wet weight) or greater, a plan shall be submitted within 30 days advising the Director of Office of Inspection and Enforcement of the proposed action to ensure that plant-related annual doses will be within the design objective of 15 mrem/yr to the thyroid of any individual.

c. Nonroutine Radioactive Effluent Report

The reporting requirements for nonroutine radioactive discharges are specified in Section 2.4 and 3.4 of these specifications.

5.6.3.1 Changes in Environmental Technical Specifications

Request for change in environmental technical specifications, except as noted in Section 5.1.1.5, shall be submitted to the Director of Nuclear Reactor Regulation, USNRC for review and authorization. At the same time the licensee shall notify the N.Y.S. Department of Environmental Conservation of the request. The request shall include an evaluation of the environmental impact of the proposed change.

5.0 ADMINISTRATIVE CONTROLS

5.6 Specifications (Cont'd)

- 5.6.3.2 When changes or additions to permits and certificates required by Federal, state, local, and regional authorities for the protection of the environment are submitted to the concerned agency for approval, they will also be submitted to the Director of Nuclear Reactor Regulation, USNRC, for information.
- 5.6.3.3 The NFSC shall review all proposed changes to the radiological portions of the ETSR including the supporting analysis prior to submittal of such proposed changes to the NRC.