



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 3, 2001

Mr. Nathan L. Haskell, Director
Licensing and Performance Assessment
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT RE: TECHNICAL
SPECIFICATIONS TASK FORCE CHANGE NO. 258, REVISION 4,
"CHANGES TO SECTION 5.0, ADMINISTRATIVE CONTROLS"
(TAC NO. MB0868)

Dear Mr. Haskell:

The Commission has issued the enclosed Amendment No. 196 to Facility Operating License No. DPR-20 for the Palisades Plant. The amendment consists of changes to the Technical Specifications (TSs) in response to a portion of your application dated December 7, 2000.

The amendment changes the TSs in accordance with changes to the "Standard Technical Specifications, Combustion Engineering Plants," NUREG 1432, Revision 1, made by the Nuclear Energy Institute Technical Specifications Task Force Change Number 258, Revision 4, addressing changes to various administrative controls in the TSs.

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink that reads "Claudia M. Craig for".

Darl S. Hood, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosures: 1. Amendment No. 196 to DPR-20
2. Safety Evaluation

cc w/encls: See next page

May 3, 2001

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/RA by C. Craig for/

Darl S. Hood, Senior Project Manager, Section 1
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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

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DISTRIBUTION

PUBLIC	OGC	SMiranda
PDIII-1 Reading	ACRS	TTjader
CCraig	WBeckner	
DHood	GHill(2)	
RBouling	AVegel, RGN-III	*Provided SE input by memo

OFFICE	PDII-1/PM	PDIII-1/PM	PDIII-1/LA	RT-3*	OGC	PDIII-1/SC
NAME	SMiranda ^{DSH}	DHood ^{DSH}	RBouling ^{DSH}	RDennig	WBeckner	CCraig
DATE	4/24/01	4/24/01	4/24/01	3/16/01	4/27/01	5/3/01

Palisades Plant

cc:

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Site Vice President
Palisades Plant
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Covert, MI 49043

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Consumers Energy Company
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P.O. Box 30212
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January 2000



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CONSUMERS ENERGY COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 196
License No. DPR-20

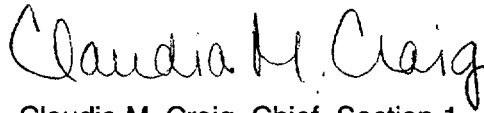
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consumers Energy Company (the licensee) dated December 7, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to the license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-20 is hereby amended to read as follows:

The Technical Specifications contained in Appendix A, as revised through Amendment No. 196 , and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Consumers Energy Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: May 3, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 196

FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

5.0-3
5.0-4
5.0-5
5.0-6
5.0-7
5.0-8
5.0-9
5.0-29
5.0-30
-
-

INSERT

5.0-3
5.0-4
5.0-5
5.0-6
5.0-7
5.0-8
5.0-9
5.0-29
5.0-30
5.0-31
5.0-32

5.2 Organization

5.2.2 Plant Staff (continued)

- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i), and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the requirements.
- d. A radiation safety technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- e. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed SROs, licensed ROs, radiation safety personnel, auxiliary operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviations from the overtime guidelines shall be authorized in advance by the plant superintendent or his designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

- f. The operations manager or an assistant operations manager shall hold an SRO license. The individual holding the SRO license shall be responsible for directing the activities of the licensed operators.
 - g. An individual shall provide advisory technical support to the plant operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the plant. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift (Published in Federal Register 50 FR 43621, October 28, 1985).
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5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

- 5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.
- 5.3.2 The radiation safety manager shall meet the qualifications of a Radiation Protection Manager as defined in Regulatory Guide 1.8, September 1975. For the purpose of this section, "Equivalent," as utilized in Regulatory Guide 1.8 for the bachelor's degree requirement, may be met with four years of any one or combination of the following: (a) Formal schooling in science or engineering, or (b) operational or technical experience and training in nuclear power.
- 5.3.3 The individual, required by Specification 5.2.2g, assigned to provide advisory technical support to the plant operations shift crew, shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift (Published in Federal Register 50 FR 43621, October 28, 1985).
- 5.3.4 The plant staff who perform reviews which ensure compliance with 10 CFR 50.59 shall meet or exceed the minimum qualifications of ANS 3.1-1987, Section 4.7.1 and 4.7.2. A Senior Reactor Operator license or certification shall be considered equivalent to a bachelors degree for the purpose of this specification.
-
-

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

- 5.4.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:
- a. The applicable procedures recommended in of Regulatory Guide 1.33, Revision 2, February 1978.
 - b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;
 - c. Site Fire Protection Program implementation.
 - d. All programs specified in Specification 5.5.
-

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained:

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain (1) the radioactive effluent controls and radiological environmental monitoring activities and (2) descriptions of the information that should be included in the Radiological Environmental Operating Report, and Radioactive Effluent Release Report required by Specification 5.6.2 and Specification 5.6.3.
- c. Changes to ODCM:
 1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes, and
 - b. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
 2. Shall become effective after approval by the plant superintendent.
 3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage to the engineered safeguards rooms, from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident, to as low as practical. The systems include the Containment Spray System, the Safety Injection System, the Shutdown Cooling System, and the containment sump suction piping. This program shall include the following:

- a. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
- b. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.
- c. The portion of the shutdown cooling system that is outside the containment shall be tested either by use in normal operation or hydrostatically tested at 255 psig.
- d. Piping from valves CV-3029 and CV-3030 to the discharge of the safety injection pumps and containment spray pumps shall be hydrostatically tested at no less than 100 psig.
- e. The maximum allowable leakage from the recirculation heat removal systems' components (which include valve stems, flanges and pump seals) shall not exceed 0.2 gallon per minute under the normal hydrostatic head from the SIRW tank (approximately 44 psig).

5.5.3 Post Accident Sampling Program

[deleted]

5.5 Programs and Manuals

5.5.4 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 Offsite Dose Calculation Manual (ODCM), (2) shall be implemented by operating 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 functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 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. Limitation on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each plant to unrestricted areas conforming to 10 CFR 50, Appendix I,
- e. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be in accordance with the following:
 1. For noble gases: a dose rate \leq 500 mrem/yr to the whole body and a dose rate \leq 3000 mrem/yr to the skin, and
 2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days: a dose rate \leq 1500 mrem/yr to any organ;
- f. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary conforming to 10 CFR 50, Appendix I,

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

- g. Limitations on the annual and quarterly doses to a member of the public from Iodine-131, Iodine-133, tritium and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each plant to areas beyond the site boundary conforming to 10 CFR 50, Appendix I,
- h. Limitations on the annual doses or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR 190.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation

- a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
- b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP), or equivalent, that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP, or equivalent, while performing their assigned duties, provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual or group entering such an area shall possess:
 1. A radiation monitoring device that continuously displays radiation dose rates in the area; or
 2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

5.7 High Radiation Area

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area, and who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:
 1. All such door and gate keys shall be maintained under the administrative control of the shift supervisor, radiation protection manager, or his or her designee.
 2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP, or equivalent, while performing radiation surveys in such areas, provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual or group entering such an area shall possess:
 1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, and with the means to communicate with and control every individual in the area, or

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; and who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
 4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.
- f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 196 TO FACILITY OPERATING LICENSE NO. DPR-20
CONSUMERS ENERGY COMPANY
PALISADES PLANT
DOCKET NO. 50-255

1.0 INTRODUCTION

By application dated December 7, 2000, the Consumers Energy Company (the licensee) requested an amendment to the Technical Specifications (TSs) for the Palisades Plant. This safety evaluation addresses the portion of the December 7, 2000, application related to Technical Specification Task Force Change Number 258, Revision 4 (TSTF-258R4), "Changes to Section 5.0, Administrative Controls." The proposed amendment would change the TSs in accordance with changes to the "Standard Technical Specifications, Combustion Engineering Plants," NUREG 1432, Revision 1, made by the Nuclear Energy Institute TSTF-258R4, addressing changes to various administrative controls in the TSs.

Specifically, the following changes to the Palisades TSs are proposed in accordance with TSTF-258R4:

A. Changes to Administrative Controls Sections 5.2, "Organization," and 5.3, "Plant Staff Qualifications"

1. TS 5.2.2e would be revised to delete the specific detail of working hour limitations (i.e., administrative procedures are used to control working hours).
2. TS 5.2.2g would be revised to delete the specific title for the "Shift Technical Advisor" position, and to clarify the requirements for that position. Requirements for that position would be similarly reflected in TS 5.3.3.

B. Changes to Administrative Controls Section 5.5.4, "Radioactive Effluent Controls Program"

TS 5.5.4b, TS 5.5.4e, and TS 5.5.4h would be revised to be consistent with 10 CFR Part 20.

C. Changes to Administrative Controls Section 5.7, "High Radiation Area"

TS 5.7 would be revised to be consistent with 10 CFR 20.160(c) (i.e., the existing TS would be completely replaced by Insert F from TSTF-258R4).

In addition, the licensee requested additional changes based upon TSTFs other than TSTF-258R4. The NRC staff will address those changes by separate correspondence.

2.0 EVALUATION

The proposed changes, outlined in TSTF-258R4, are evaluated below:

2.1 Changes to Administrative Controls Section 5.2 and 5.3

TS 5.2.2.e. would be revised from specific working hour limits to administrative procedures to control working hours. The proposed changes would provide reasonable assurance that impaired performance caused by excessive working hours would not jeopardize safe plant operation. Specific working hour limits would not otherwise be required to be in the TSs under 10 CFR 50.36(c)(5), "*Administrative controls.*" Specific controls for working hours of reactor plant staff are described in procedures that require a deliberate decision-making process to minimize the potential for impaired personnel performance, and that established procedure control processes would provide sufficient control for changes to that procedure. Additionally, the statement "Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the plant superintendent or his designee to ensure that excessive hours have not been assigned" would be deleted. Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours," does not cite the need for, or specify this language. The additional requirement to have the plant manager or his designee review individual overtime on a monthly basis is unnecessary since sufficient administrative controls and policies exist.

These changes are consistent with approved TSTF-258R4, and are, therefore, acceptable.

TS 5.2.2.g would be revised to eliminate the title of "Shift Technical Advisor (STA)." The STA function may be fulfilled by one of the other on-shift individuals. TS 5.2.2.g would be revised so that it does not imply that the STA and the shift supervisor must be different individuals. Option 1 of the Commission Policy Statement on Engineering Expertise on Shift is satisfied by assigning an individual with specified educational qualifications to each operating crew as one of the senior reactor operators (SROs) (preferably the shift supervisor), as required by 10 CFR 50.54(m)(2)(i) to provide the technical expertise on shift. Therefore, the wording would be revised such that the STA function may be provided by either a separate individual or the individual who also fulfills another role in the shift command structure. TS 5.3.3, which specifies the required qualifications for the STA and shift engineer, would be revised to agree with the qualification requirements contained in TS 5.2.2g. The change states that the individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift (Published in Federal Register (50 FR 43621) October 28, 1985).

These changes are consistent with approved TSTF-258R4, and are, therefore, acceptable.

2.2 Changes to Administrative Controls Section 5.5.4

After issuance of Generic Letter 89-01, the 10 CFR Part 20 requirements on radioactive effluents, radiation monitoring, high radiation areas, and associated reporting requirements were revised. This revision to the administrative controls section of the TSs would update the Radioactive Effluent Controls Program to make it consistent with the revised 10 CFR Part 20 requirements. The proposed TS changes would maintain the overall level of effluent control

consistent with the revised 10 CFR Part 20, while retaining the operational flexibility in TSs that existed under the previous 10 CFR Part 20 limits. The changes on limitations to radioactive material released in effluents (i.e., less than 10 times the concentration values...) provide reasonable assurance that the levels of radioactive materials in unrestricted areas would result in exposures within (1) the Section II.A design objectives of Appendix I to 10 CFR Part 50, and (2) restrictions authorized by 10 CFR Part 20.1301(e). These changes are intended to ensure proper implementation of the revised 10 CFR Part 20 requirements by ensuring the TSs do not refer to superceded 10 CFR Part 20 regulatory requirements. The noble gas dose rate limit is with respect to "whole body" based on the dosimetry of the International Committee on Radiological Protection (ICRP)-2, and as shown in NUREG-1301, Specification 3.11.2.1, page 45.

These changes are consistent with approved TSTF-258R4, and are, therefore, acceptable.

The provisions of TS Surveillance Requirement (SR) 3.0.2 would be applied to the Radioactive Effluent Controls Program surveillance frequencies to allow for scheduling flexibility. SR 3.0.2 permits a 25-percent extension of the interval specified in the frequency. Allowing a 25-percent extension in the frequency of performing the cumulative dose and projected dose calculations would have no effect on the outcome of the calculations.

This change is consistent with approved TSTF-258R4, and is, therefore, acceptable.

2.3 Changes to Administrative Controls Section 5.7

This change would revise TS 5.7 in accordance with 10 CFR 20.1601(c) and would update the acceptable alternate controls to those given in 10 CFR 20.1601. This change is consistent with approved TSTF-258R4, and is, therefore, acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The Michigan State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment would change requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. This amendment also relates to changes in recordkeeping, reporting, or administrative procedures or requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (66 FR 7678). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Tjader

Date: May 3, 2001