JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 2.2

Concentration of Liquid Effluents

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 2.2

Concentration of Liquid Effluents

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 2.2

Concentration of Liquid Effluents

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 2.2 - CONCENTRATION OF LIQUID EFFLUENTS

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 2.2 places limitations on the concentration of radioactive materials in liquid effluents to ensure that the concentrations are kept to acceptable levels. The acceptable levels are specified in 10 CFR 20, Appendix B, Table II, Column 2. For dissolved or entrained noble gases the concentration shall be limited to $2 * 10^{-4}$ μCi/ml.

Effluent control is for protection against radiation hazards from licensed activities, not accidents. No screening criteria apply because the process variable of the LCO is not an initial condition of a Design Basis Accident (DBA) or transient analysis. Neither does the system comprise a part of the safety sequence analysis or a part of the primary coolant pressure boundary.

Administrative controls are included in the Technical Specifications to ensure continued compliance with the applicable regulatory requirements. ITS 5.5.4, "Radioactive Effluent Controls Program" and ITS 5.5.1, "Offsite Dose Calculation Manual (ODCM)" contain requirements to ensure the liquid effluents meet the limits contained in applicable regulations and that future changes to the ODCM will be reviewed to ensure that such changes will "maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

DISCUSSION OF CHANGES
CTS RETS: 2.2 - CONCENTRATION OF LIQUID EFFLUENTS

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

CTS RETS 2.2 does not identify a parameter which is an initial condition or assumption for a DBA or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

Therefore, CTS RETS 2.2 did not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications and will be relocated to the ODCM. Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 2.2

Concentration of Liquid Effluents

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 2.2 - CONCENTRATION OF LIQUID EFFLUENTS

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 2.3

Dose From Liquid Effluents

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 2.3

Dose From Liquid Effluents

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 2.3

Dose From Liquid Effluents

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 2.3 - DOSE FROM LIQUID EFFLUENTS

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 2.3 imposes dose limitations from liquid effluents to the members of the public. Limitations of the quarterly and annual projected doses to members of the public which results from cumulative liquid effluent discharges during normal operation over extended periods is intended to assure compliance with the dose objectives of 10 CFR 50, Appendix I. These limits are not related to protection of the public from any Design Basis Accident (DBA) or transient.

Administrative controls are included in the Technical Specifications to ensure continued compliance with the applicable regulatory requirements. ITS 5.5.4, "Radioactive Effluent Controls Program" and ITS 5.5.1, "Offsite Dose Calculation Manual (ODCM)" contain requirements to ensure the liquid effluents meet the limits contained in applicable regulations and that future changes to the ODCM will be reviewed to ensure that such changes will "maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

CTS RETS 2.3 does not identify a parameter which is an initial condition or assumption for a DBA or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

DISCUSSION OF CHANGES
CTS RETS: 2.3 - DOSE FROM LIQUID EFFLUENTS

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

Therefore, CTS RETS 2.3 does not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications and will be relocated to the ODCM. Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 2.3

Dose From Liquid Effluents

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 2.3 - DOSE FROM LIQUID EFFLUENTS

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:RETS 2.4

Liquid Radioactive Waste Treatment System Operations

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:RETS 2.4

Liquid Radioactive Waste Treatment System Operations

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:RETS 2.4

Liquid Radioactive Waste Treatment System Operations

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 2.4 - LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM OPERATIONS

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 2.4 requires that the liquid radwaste treatment system be OPERABLE, and appropriate portions of the system be used to reduce releases of radioactivity when the projected doses due to the liquid effluent, from the plant, to UNRESTRICTED AREAS would exceed 0.06 mrem to the whole body or 0.2 mrem to any organ in a 31-day period. The requirement for a liquid waste treatment system in 10 CFR Part 50, Appendix A, GDC 60, pertains to controlling the release of site effluents during normal operational occurrences. No loss of primary coolant is involved; neither is an accident condition assumed or implied. The limits for release in 10 CFR Part 50, Appendix I, Section II.A, for liquids are design objectives for operation.

Administrative controls are included in the Technical Specifications to ensure continued compliance with the applicable regulatory requirements. ITS 5.5.4, "Radioactive Effluent Controls Program" and ITS 5.5.1, "Offsite Dose Calculation Manual (ODCM)" contain requirements to ensure the liquid effluents meet the limits contained in applicable regulations and that future changes to the ODCM will be reviewed to ensure that such changes will "maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

DISCUSSION OF CHANGES
CTS RETS: 2.4 - LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM OPERATIONS

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

CTS RETS 2.4 does not identify a parameter which is an initial condition or assumption for a Design Basis Accident (DBA) or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

Therefore, CTS RETS 2.4 did not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications, and will be relocated to the Offsite Dose Calculation Manual (ODCM). Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:RETS 2.4

Liquid Radioactive Waste Treatment System Operations

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 2.4 - LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM OPERATIONS

TECHNICAL CHANGE - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 3.1

Gaseous Effluent Monitors

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.1

Gaseous Effluent Monitors

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.1

Gaseous Effluent Monitors

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 3.1 - GASEOUS EFFLUENT MONITORS

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 3.1 and the associated instrumentation surveillances in CTS RETS Table 3.10-2 contain requirements for the operability of the gaseous effluent monitors. CTS RETS 3.1 ensures that radioactive gaseous effluent releases are properly monitored and recorded during release and that gaseous effluent monitor alarms and trip setpoints are established in accordance with the Offsite Dose Calculation Manual (ODCM). The alarm/trip setpoints are established to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR 20 and 10 CFR 50, Appendix I.

The radioactive gaseous effluent monitors are used to show conformance to the discharge limits of 10 CFR 20 and 10 CFR 50, Appendix I. This instrumentation provides a continuous check on the release of radioactive gaseous effluent from the gaseous effluent flow paths. Plant Design Basis Accident (DBA) analyses do not assume any action, either initiated by, or resulting from information provided by radioactive effluent monitors. The gaseous effluent flow paths are neither part of a safety system nor are they connected to the reactor coolant system.

Administrative controls are included in the Technical Specifications to ensure continued compliance with the applicable regulatory requirements. ITS 5.5.4, "Radioactive Effluent Controls Program" and ITS 5.5.1, "ODCM" contains requirements to ensure that all gaseous effluents meet the limits contained in applicable regulations and future changes to the

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

ODCM will be reviewed to ensure that such changes will "maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

CTS RETS 3.1 does not identify a parameter which is an initial condition or assumption for a DBA or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

Therefore, CTS RETS 3.1 does not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications and will be relocated to the ODCM. Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.1

Gaseous Effluent Monitors

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 3.1 - GASEOUS EFFLUENT MONITORS

TECHNICAL CHANGE - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:RETS 3.2

Gaseous Dose Rates

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:RETS 3.2

Gaseous Dose Rates

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:RETS 3.2

Gaseous Dose Rates

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 3.2 - GASEOUS DOSE RATES

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 3.2 limits the dose rate due to gaseous effluents at or beyond the site boundary at any time to a value less than the yearly dose limit of 10 CFR Part 20. This provides reasonable assurance that no member of the public is exposed to annual average concentrations which exceed the limits of 10 CFR Part 20 Appendix B, Table II. This is a limit which applies to normal operation of the plant. It is not assumed as an initial condition of any Design Basis Accident (DBA) or transient analysis and is not relied upon to limit the consequences of such events.

Administrative controls are included in the Technical Specifications to ensure continued compliance with the applicable regulatory requirements. ITS 5.5.4, "Radioactive Effluent Controls Program" and ITS 5.5.1, "ODCM" contains requirements to ensure that all gaseous effluents meet the limits contained in applicable regulations and future changes to the ODCM will be reviewed to ensure that such changes will "maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

CTS RETS 3.2 does not identify a parameter which is an initial condition or assumption for a DBA or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, provide any mitigation of a design basis event and is not a structure system or

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

component which operating experience or PRA has shown to be significant to public health and safety.

Therefore, CTS RETS 3.2 did not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications, and will be relocated to the Offsite Dose Calculation Manual (ODCM). Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

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IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:RETS 3.2

Gaseous Dose Rates

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 3.2 - GASEOUS DOSE RATES

TECHNICAL CHANGE - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 3.3

Air Dose, Noble Gas

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.3

Air Dose, Noble Gas

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.3

Air Dose, Noble Gas

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 3.3 - AIR DOSE, NOBLE GASES

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 3.3 places limits on the noble gas releases from the plant. Limitation of the quarterly and annual air doses from noble gases in plant gaseous effluents during normal operation over extended periods is intended to assure compliance with the dose objectives of 10 CFR 50, Appendix I. These limits are not related to protection of the public from the consequences of any Design Basis Accident (DBA) or transient.

Administrative controls are included in the Technical Specifications to ensure continued compliance with the applicable regulatory requirements. ITS 5.5.4, "Radioactive Effluent Controls Program" and ITS 5.5.1, "ODCM" contains requirements to ensure that all gaseous effluents meet the limits contained in applicable regulations and future changes to the ODCM will be reviewed to ensure that such changes will "maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

CTS RETS 3.3 does not identify a parameter which is an initial condition or assumption for a DBA or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

DISCUSSION OF CHANGES
CTS RETS: 3.3 - AIR DOSE, NOBLE GASES

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

Therefore, CTS RETS 3.3 did not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications and will be relocated to the ODCM. Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

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IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.3

Air Dose, Noble Gas

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 3.3 - AIR DOSE, NOBLE GASES

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 3.4

Dose Due to Iodine-131, Iodine-I33, Tritium and Radionuclides in Particulate Form

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.4

Dose Due to Iodine-131, Iodine-I33, Tritium and Radionuclides in Particulate Form

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.4

Dose Due to Iodine-131, Iodine-I33, Tritium and Radionuclides in Particulate Form

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 3.4 - DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 3.4 provides quarterly and yearly limitations on the dose to members of the public from iodine-131, iodine-133, tritium, and all radioactive material in particulate form with half lives greater than 8 days in gaseous effluents released, from the plant, to areas at or beyond the site boundary. These limitations of the quarterly and annual projected doses to members of the public from radionuclides other than noble gases during normal operation over extended periods is intended to assure compliance with the dose objectives of 10 CFR Part 50, Appendix I. These limits are not related to protection of the public from the consequences of any Design Basis Accident (DBA) or transient.

Administrative controls are included in the Technical Specifications to ensure continued compliance with the applicable regulatory requirements. ITS 5.5.4, "Radioactive Effluent Controls Program" and ITS 5.5.1, "ODCM" contains requirements to ensure that all gaseous effluents meet the limits contained in applicable regulations and future changes to the ODCM will be reviewed to ensure that such changes will "maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

CTS RETS 3.4 does not identify a parameter which is an initial condition or assumption for a DBA or transient, identify a significant abnormal

DISCUSSION OF CHANGES
CTS RETS: 3.4 - DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

Therefore, CTS RETS 3.4 does not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications, and will be relocated to the Offsite Dose Calculation Manual (ODCM). Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

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IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.4

Dose Due to Iodine-131, Iodine-I33, Tritium and Radionuclides in Particulate Form

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 3.4 - DOSES DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 3.6

Offgas Treatment System

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.6

Offgas Treatment System

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.6

Offgas Treatment System

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 3.6 - OFFGAS TREATMENT SYSTEM

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 3.6 places limitations on the Offgas Treatment System. The Offgas Treatment System reduces the activity level of the non-condensible fission product gases from fuel defects removed from the main condenser prior to their release to the environs. The Offgas Treatment System is designed such that gaseous radwaste discharged from the Elevated Release Point will not exceed the limits set forth in the ALARA requirements of 10 CFR 50, Appendix I. The operability of the offgas system is not assumed in the analysis of any Design Basis Accident (DBA) or transient. However offgas activity is an initial condition of a DBA and is being retained in LCO 3.7.5, "Main Condenser Steam Jet Air Ejector (SJAE). Therefore there is no need to retain this requirement.

The Offgas Treatment System is intended to provide reasonable assurance that releases of radioactive materials during normal operation of the plant are "as low as reasonably achievable" (ALARA) and to help assure compliance with the dose objectives of 10 CFR 50, Appendix I. These objectives are not related to protection of the public from any DBA or transient.

Additional administrative controls are also proposed to be added to the Technical Specifications to ensure compliance with the applicable regulatory requirements is maintained. Proposed Specification 5.5.1 specifies that future changes to the Offsite Dose Calculation Manual (ODCM) will be reviewed to ensure that such changes will "maintain the

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

CTS RETS 3.6 does not identify a parameter which is an initial condition or assumption for a DBA or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

Therefore, CTS RETS 3.6 does not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications and will be relocated to the ODCM. Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 3.6

Offgas Treatment System

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 3.6 - OFFGAS TREATMENT SYSTEM

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 4.0

Solid Radioactive Waste

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 4.0

Solid Radioactive Waste

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 4.0

Solid Radioactive Waste

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 4.0 - SOLID RADIOACTIVE WASTE

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 4.0 specifies that the solid radwaste system shall be used in accordance with the Process Control Program (PCP) to process wet radioactive wastes to meet shipping and burial ground requirements. The solid radwaste system is a logical continuation of the liquid radwaste system. The system serves to control operational release of solid radwaste, not accidental release.

CTS RETS 4.0 does not identify a parameter which is an initial condition or assumption for a Design Basis Accident (DBA) or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

Therefore, CTS RETS 4.0 does not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications and will be relocated to the PCP. Changes to the PCP will be controlled by the provisions of 10 CFR 50.59. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the PCP.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 4.0

Solid Radioactive Waste

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 4.0 - SOLID RADIOACTIVE WASTE

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 5.0

Total Dose

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 5.0

Total Dose

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 5.0

Total Dose

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 5.0 - TOTAL DOSE

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 5.0 limits the annual doses to individual members of the public from all plant sources. This is intended to assure that normal operation of the plant is in compliance with the provisions of 40 CFR Part 190. These limits are not related to protection of the public from any Design Basis Accident (DBA) or transient.

Administrative controls are included in the Technical Specifications to ensure continued compliance with the applicable regulatory requirements. ITS 5.5.4, "Radioactive Effluent Controls Program" and ITS 5.5.1, "Offsite Dose Calculation Manual (ODCM)" contain requirements to ensure that the limits contained in applicable regulations and future changes to the ODCM will be reviewed to ensure that such changes will "maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

CTS RETS 5.0 does not identify a parameter which is an initial condition or assumption for a DBA or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

Therefore, CTS RETS 5.0 does not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications and will be relocated to the ODCM. Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 5.0

Total Dose

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 5.0 - TOTAL DOSE FROM URANIUM FUEL CYCLE

TECHNICAL CHANGE - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 6.1

Monitoring Program

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 6.1

Monitoring Program

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 6.1

Monitoring Program

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 6.1 - MONITORING PROGRAM

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 The radiological environmental monitoring program required by CTS RETS 6.1 provides measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public resulting from plant operations and is not used for accident monitoring. This monitoring program assures that 10 CFR 50, Appendix I, Section IV.B.2 is met.

Administrative controls are proposed to be added to the Technical Specifications to ensure compliance with the applicable regulatory requirements is maintained. ITS 5.5.1, "Offsite Dose Calculation Manual (ODCM)" specifies that future changes to the ODCM will be reviewed to ensure that such changes will "maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations."

CTS RETS 6.1 does not identify a parameter which is an initial condition or assumption for a Design Basis Accident (DBA) or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

TECHNICAL CHANGES - RELOCATIONS

R1 (continued)

Therefore, CTS RETS 6.1 does not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications and will be relocated to the ODCM. Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation of the ODCM.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 6.1

Monitoring Program

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 6.1 - MONITORING PROGRAM

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 6.2

Land Use Census Program

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 6.2

Land Use Census Program

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 6.2

Land Use Census Program

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 6.2 - LAND USE CENSUS PROGRAM

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 CTS RETS 6.2 places requirements on the land use census. The land use census required by this specification supports the measurement of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public resulting from station operations. The land use census ensures that changes in the use of areas at or beyond the SITE BOUNDARY are identified and changes made to the radiological environmental monitoring program, if required.

CTS RETS 6.2 does not identify a parameter which is an initial condition or assumption for a Design Basis Accident (DBA) or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

Therefore, CTS RETS 6.2 did not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications, and will be relocated to the Offsite Dose Calculation Manual (ODCM). Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 6.2

Land Use Census Program

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 6.2 - LAND USE CENSUS PROGRAM

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

CTS:CTS RETS 6.3

Interlaboratory Comparison Program

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

DISCUSSION OF CHANGES (DOCs) TO THE CTS

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 6.3

Interlaboratory Comparison Program

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 6.3

Interlaboratory Comparison Program

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
CTS RETS: 6.3 - INTERLABORATORY COMPARISON PROGRAM

ADMINISTRATIVE CHANGES

None

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

R1 The Interlaboratory Comparison Program required by CTS RETS 6.3 confirms the accuracy of the measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public resulting from station operation. This program ensures independent checks on the precision and accuracy of the instrumentation used in the measurements of radioactive material for the radiological environmental monitoring program are performed. This program is not utilized for any post accident monitoring.

CTS RETS 6.3 does not identify a parameter which is an initial condition or assumption for a Design Basis Accident (DBA) or transient, identify a significant abnormal degradation of the reactor coolant pressure boundary, mitigate a design basis event and is not a structure system or component which operating experience or PRA has shown to be significant to public health and safety.

Therefore, CTS RETS 6.3 does not satisfy the criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Application of Selection Criteria to the JAFNPP Technical Specifications and will be relocated to the Offsite Dose Calculation Manual (ODCM). Changes to the ODCM will be controlled by the provisions of the ODCM change control process described in Chapter 5 of the ITS. This change is consistent with Generic Letter 89-01 for removal of Radiological Effluent Technical Specification (RETS) and relocation to the ODCM.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: CTS RETS 6.3

Interlaboratory Comparison Program

NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS RETS: 6.3 - INTERLABORATORY COMPARISON PROGRAM

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes identified for this Specification.

NO SIGNIFICANT HAZARDS CONSIDERATION
GENERIC CHANGES

ADMINISTRATIVE CHANGES
("A" Labeled Comments/Discussions)

In the conversion of the JAFNPP Technical Specifications to the proposed plant specific Improved Technical Specifications certain wording preferences or conventions are being adopted which do not result in technical changes. Editorial changes, clarification, reformatting, rewording and revised numbering are being adopted to make the improved Technical Specifications consistent with NUREG-1433, "Standard Technical Specifications - General Electric Plants, BWR/4," Revision 1, including applicable approved and proposed generic changes.

New York Power Authority has evaluated each of the proposed Technical Specification changes identified as "Administrative Changes" and has determined that they do not involve a significant hazards consideration. This determination has been performed in accordance with the criteria set forth in 10 CFR 50.92. The bases for the determination that the proposed changes do not involve a significant hazards consideration are discussed below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

   The proposed changes consist of editorial changes and clarification, reformatting, rewording and renumbering of the current Technical Specifications. The proposed changes do not involve any technical modifications to existing requirements. These changes are administrative in nature and do not impact initiators of analyzed events or alter any assumptions relative to mitigation of accidents or transients. Therefore, these changes do not involve any increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

   The proposed changes do not involve any physical alteration of plant systems, structures, or components or changes in parameters governing normal plant operation. The proposed changes do not impose or eliminate any requirements. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

   The proposed changes will not reduce a margin of safety because they do not impact any assumptions used in transient or safety analyses. These changes are administrative in nature and, as such, do not impact any technical requirements. Therefore, these changes do not involve any reduction in a margin of safety.

NO SIGNIFICANT HAZARDS CONSIDERATION
GENERIC CHANGES

TECHNICAL CHANGES - MORE RESTRICTIVE CHANGES
("M" Labeled Comments/Discussions)

The JAFNPP Technical Specifications are proposed to be modified in some areas to impose more restrictive requirements than currently exist. These more restrictive changes are being imposed to be consistent with NUREG-1433, "Standard Technical Specifications - General Electric Plants, BWR/4," Revision 1, including applicable approved and proposed generic changes.

New York Power Authority has evaluated each of the proposed Technical Specification changes identified as "Technical Changes - More Restrictive" and has determined that they do not involve a significant hazards consideration. This determination has been performed in accordance with the criteria set forth in 10 CFR 50.92. The bases for the determination that the proposed changes do not involve a significant hazards consideration are discussed below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

   The proposed changes provide requirements determined to be more restrictive than the current Technical Specifications requirements for operation of the facility. These more restrictive requirements are not assumed to be initiators of analyzed events and will not alter assumptions relative to mitigation of accident or transient events. These changes have been confirmed to ensure that no previously evaluated accident has been adversely affected. The more restrictive requirements being proposed enhance assurance that process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis of the plant. Therefore, these changes do not involve any increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

   The proposed changes do not involve any physical alteration of plant systems, structures, or components or changes in parameters governing normal plant operation. These changes do impose new or additional requirements which are consistent with assumptions made in the safety analysis and licensing basis. The additional requirements include new Surveillance Requirements, more restrictive Frequencies and Completion Times, new LCOs, more restrictive Required Actions and Applicabilities, and other operational restrictions that enhance safe operation. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

TECHNICAL CHANGES - MORE RESTRICTIVE CHANGES
("M" Labeled Comments/Discussions) (continued)

3. Does this change involve a significant reduction in a margin of safety?

The imposition of more restrictive requirements either has no impact or increases the margin of plant safety. Each of the changes in this category, while providing new or additional requirements designed to enhance plant safety, is consistent with the safety analyses and licensing basis. Therefore, these changes do not involve a reduction in a margin of safety.

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)
("LA" Labeled Comments/Discussions)

In the conversion of the JAFNPP Technical Specifications to the proposed plant specific Improved Technical Specifications, portions of some Specifications which are descriptive in nature regarding equipment, systems, actions, surveillances or programs are proposed to be relocated from the Specifications to the Bases, Updated Final Safety Analysis Report, procedures or other licensee controlled documents. The details associated with the involved specifications are not required to be in the ITS to provide adequate protection of the public health and safety, since the ITS still retains the requirement for compliance with the applicable specifications. Changes to the Bases are controlled in accordance with the proposed Bases Control Program described in Chapter 5 of the Improved Technical Specifications. Changes to the UFSAR and administrative procedures which control revisions to these relocated requirements are controlled in accordance with licensee controlled programs.

This approach provides an effective level of regulatory control and provides for a more appropriate change control process. The level of safety of facility operation is unaffected by the change because there is no change in the Technical Specification requirements. Furthermore, NRC and utility resources associated with processing license amendments to these requirements will be reduced. Therefore, relocation of these details is acceptable.

New York Power Authority has evaluated each of the proposed Technical Specification changes identified as "Technical Changes - Less Restrictive (Generic)" and has determined that they do not involve a significant hazards consideration. This determination has been performed in accordance with the criteria set forth in 10 CFR 50.92. The bases for the determination that proposed changes do not involve a significant hazards consideration are discussed below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

   The proposed changes relocate requirements from the Technical Specifications to the Bases, Updated Final Safety Analysis Report, procedures or other licensee controlled documents. The documents containing the relocated requirements are subject to the change control of licensee controlled programs. Since any changes to these documents will be evaluated in accordance with the requirements of licensee controlled programs, no increase in the probability or consequences of an accident previously evaluated will be permitted without further NRC review. Therefore, these changes do not involve any increase in the probability or consequences of an accident previously evaluated.

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)
("LA" Labeled Comments/Discussions) (continued)

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes do not involve any physical alteration of plant systems, structures or components or changes in parameters governing normal plant operation. These changes do not introduce a new mode of plant operation. Since any future changes to these requirements will be evaluated in accordance with licensee controlled programs, the possibility of a new or different kind of accident from any accident previously evaluated will not be permitted without further NRC review. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The proposed changes will not reduce a margin of safety because they do not impact any assumptions used in transient and safety analyses. The requirements that are transposed from the Technical Specifications to other licensee controlled documents are the same as the existing Technical Specifications. Since any future changes to these requirements will be evaluated in accordance with the requirements of licensee controlled programs, no reduction in any margin of safety will be permitted without further NRC review. Therefore, these changes do not involve any reduction in a margin of safety.

RELOCATED SPECIFICATIONS
("R" Labeled Comments/Discussions)

Relocating Requirements which do not meet the Technical Specification criteria to documents with an established control program allows the Technical Specifications to be reserved only for those conditions or limitations upon reactor operation which are necessary to adequately limit the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, thereby focusing the scope of Technical Specifications.

Therefore, requirements which do not meet the selection criteria in 10 CFR 50.36(c)(2)(ii) have been relocated to licensee controlled documents. The criteria address the scope and purpose of Technical Specifications. In doing so, they establish a specific set of objective criteria for determining which regulatory requirements and operating restrictions should be included in Technical Specifications. These criteria are as follows:

Criterion 1: Installed instrumentation that is used to detect and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary;

Criterion 2: A process variable that is an initial condition of a design basis accident (DBA) or transient analyses that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;

Criterion 3: 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 barrier;

Criterion 4: A structure, system or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

The application of these criteria is provided in the "Application of 10 CFR 50.36 and NRC Selection Criteria to the James A. FitzPatrick Nuclear Power Plant Technical Specifications." Requirements which met the criteria have been included in the proposed improved Technical Specifications. New York Power Authority (NYPA) proposes to remove those requirements which do not meet the criteria from the Technical Specifications and relocate them to a suitable licensee controlled document. The requirements in the relocated Specifications are not affected by this Technical Specification change. NYPA will initially continue to perform the required operation and maintenance to assure that the requirements are satisfied. Relocating specific requirements for systems or variables has no impact on the system's operability or the variable's

RELOCATED SPECIFICATIONS
("R" Labeled Comments/Discussions) (continued)

maintenance, as applicable. Licensee controlled programs will be utilized as the control mechanism for the relocated Specifications as they will be placed in plant procedures or other licensee controlled documents. NYPA is allowed to make changes to these requirements, without prior NRC approval, if the change does not involve an unreviewed safety question. These controls are considered adequate for assuring structures, systems and components in the relocated Specifications are maintained operable and variables in the relocated Specifications are maintained within limits.

NYPA has evaluated each of the proposed Technical Specification changes identified as "Relocated Specifications," and has determined that they do not involve a significant hazards consideration. This determination has been performed in accordance with the criteria set forth in 10 CFR 50.92. The bases for the determination that proposed changes do not involve a significant hazards consideration are discussed below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

   The proposed change relocates requirements and surveillances for structures, systems, components or variables which do not meet the criteria for inclusion in Technical Specifications as identified in the "Application of 10 CFR 50.36 and NRC Selection Criteria to the James A. FitzPatrick Nuclear Power Plant Technical Specifications." The affected structures, systems, components or variables are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events. The requirements and surveillances for these affected structures, systems, components or variables are proposed to be relocated from the Technical Specifications to an appropriate administrative document under licensee control. Therefore, this change does not involve an increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated? .

   The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or change in parameters governing normal plant operation. The proposed change does not impose any different requirements and adequate control of information will be maintained. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

RELOCATED SPECIFICATIONS
("R" Labeled Comments/Discussions) (continued)

3. Does this change involve a significant reduction in a margin of safety?

The proposed change will not reduce a margin of safety because it does not impact any assumptions used in transient and safety analyses. In addition, the affected requirement are proposed to be relocated to an owner controlled document for which future changes will be evaluated pursuant to the requirements of licensee controlled programs. Therefore, this change does not involve a reduction in a margin of safety.

NO SIGNIFICANT HAZARDS CONSIDERATION
GENERIC CHANGES

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)
("LB" Labeled Comments/Discussions)

In the conversion of the JAFNPP Technical Specifications to the proposed plant specific Improved Technical Specifications, portions of some Specifications which include requirements of equipment or instrumentation which have no post-accident function are proposed to be relocated from the Specifications to the Technical Requirements Manual (TRM). The TRM will be included in the Updated Final Safety Analysis Report (UFSAR) at ITS implementation. The equipment and instrumentation technical requirements associated with the involved specifications are not required to be in the ITS to provide adequate protection of the public health and safety, since the ITS still retains requirements to ensure adequate protection of the public health and safety. Changes to the TRM will be will be controlled within the same controlled methods of the UFSAR.

This approach provides an effective level of regulatory control and provides for a more appropriate change control process. The level of safety of facility operation is unaffected by the change because since the control within the TRM is adequate. Furthermore, NRC and utility resources associated with processing license amendments to these requirements will be reduced. Therefore, relocation of these details is acceptable.

New York Power Authority has evaluated each of the proposed Technical Specification changes identified as "Technical Changes - Less Restrictive (LB-Generic)" and has determined that they do not involve a significant hazards consideration. This determination has been performed in accordance with the criteria set forth in 10 CFR 50.92. The bases for the determination that proposed changes do not involve a significant hazards consideration are discussed below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

   The proposed changes relocates instrumentation requirements, which provide no post accident function from the Technical Specifications to the TRM. The TRM containing the relocated requirements are subject to the change control of licensee controlled programs. Since any changes to these documents will be evaluated in accordance with the requirements of licensee controlled programs, no increase in the probability or consequences of an accident previously evaluated will be permitted without further NRC review. Therefore, these changes do not involve any increase in the probability or consequences of an accident previously evaluated.

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)
"LB" Labeled Comments/Discussions) (continued)

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes do not involve any physical alteration of plant systems, structures or components or changes in parameters governing normal plant operation. These changes do not introduce a new mode of plant operation. Since any future changes to these requirements will be evaluated in accordance with licensee controlled programs, the possibility of a new or different kind of accident from any accident previously evaluated will not be permitted without further NRC review. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The proposed changes will not reduce a margin of safety because they do not impact any assumptions used in transient and safety analysis. The requirements that are transposed from the Technical Specifications to the TRM are the same as the existing Technical Specifications. Since any future changes to these requirements will be evaluated in accordance with the requirements of licensee controlled programs, no reduction in any margin of safety will be permitted without further NRC review. Therefore, these changes do not involve any reduction in a margin of safety.

Environmental Assessment required by 10 CFR 51.21

The New York Power Authority proposes to convert the Fitzpatrick current Technical Specifications to the FitzPatrick Improved Technical Specifications based on NUREG-1433, Revision 1 Standard Technical Specifications, General Electric Plants, BWR/4. The Technical Specification changes resulting from this conversion have been evaluated against the criteria for licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21.

Although they involve changes to limiting conditions for operation, allowable values, inspections and surveillance requirements, the proposed changes meet the criteria for categorical exclusion specified in 10 CFR 51.22(c)(9) as described in the following paragraphs:

(i) the proposed change involves no Significant Hazards Consideration (refer to the discussion of Significant Hazards Considerations in Section V of this Technical Specification Change Request),

(ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite because the proposed changes do not affect the generation of any radioactive effluents nor do they significantly affect any release path, and

(iii) there is no significant increase in individual or cumulative occupational radiation exposure.

Therefore, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment or environmental impact statement need be prepared in connection with issuance of an amendment to the Technical Specifications incorporating the changes proposed in this request.