

10 CFR 50.59
10 CFR 50.90

February 8, 2002
NG-02-0110

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Document Control Desk
Mail Station 0-P1-17
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Technical Specification Change Request (TSCR-050)
"Proposed Changes to DAEC Technical Specifications Section 5.0,
Administrative Controls"

File: A-117

Dear Sir(s):

In accordance with the Code of Federal Regulations, Title 10 Sections 50.59 and 50.90, Nuclear Management Company, LLC (NMC) hereby requests revision to the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC).

This application for amendment to the DAEC TS proposes to incorporate portions of the approved Technical Specifications Task Force (TSTF) item TSTF-258 Revision 4 into the DAEC TS. The subject TSTF was approved by the Boiling Water Reactor Owner's Group Technical Specifications Issues Coordination Committee, which reviews and endorses generic changes to the BWR/4 Standard Technical Specifications, NUREG-1433, Revision 1. The subject TSTF has been reviewed and approved by the NRC.

This TSCR makes several changes to TS Section 5.0, Administrative Controls. Revisions are made to Section 5.2.2, Unit Staff, to delete details of staffing requirements and delete requirements for the Shift Technical Advisor (STA) as a separate position while retaining the function. Section 5.5.4, Radioactive Effluent Controls Program, is revised to be consistent with the intent of 10 CFR 20. Section 5.6.4, Monthly Operating Reports, is revised by deleting periodic reporting requirements for main steam safety/relief valve challenges (consistent with Generic Letter 97-02), and Section 5.7, High Radiation Area, is revised in accordance with 10 CFR 20.1601(c).

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Rec'd 02/08/02

This application has been reviewed by the DAEC Operations Committee and the Offsite Review Committee. A copy of this submittal, along with the 10CFR 50.92 evaluation of "No Significant Hazards Consideration," is being forwarded to our appointed state official pursuant to 10 CFR Section 50.91.

There are no new commitments made in this letter.

This letter is true and accurate to the best of my knowledge and belief.

Nuclear Management Company, LLC

By *Gary Van Middlesworth*
Gary Van Middlesworth
DAEC Site Vice-President

State of Iowa
(County) of Linn

Signed and sworn to me before on this 8th day of February, 2002

By *Gary Van Middlesworth*

Notary Public in and for the State of Iowa

Nancy S. Franck



Commission Expires

Attachments:

1. Evaluation of Change Pursuant to 10 CFR Section 50.92
2. PROPOSED CHANGE TSCR-050 TO THE DUANE ARNOLD ENERGY CENTER TECHNICAL SPECIFICATIONS
3. SAFETY ASSESSMENT
4. ENVIRONMENTAL CONSIDERATION

CC: C. Bleau (w/a)
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SUBJECT: Technical Specification Change Request (TSCR-050):
"Proposed Changes to Technical Specifications Section 5.0,
Administrative Controls"

FILE: A-117

Evaluation of Change Pursuant to 10 CFR Section 50.92Background:

This proposed amendment incorporates Technical Specification Task Force (TSTF) Item TSTF-258, Revision 4, into Technical Specifications (TS) Section 5.0.

Nuclear Management Company, LLC Docket No:50-331Duane Arnold Energy Center, Linn County, IowaDate of Amendment Request: February 8, 2002Description of Amendment Request:

The proposed amendment request makes several changes to TS Section 5.0, Administrative Controls. Revisions are made to Section 5.2.2, Unit Staff, to delete details of staffing requirements and delete requirements for the Shift Technical Advisor (STA) as a separate position while retaining the function. Section 5.5.4, Radioactive Effluent Controls Program, is revised to be consistent with the intent of 10 CFR 20. Section 5.6.4, Monthly Operating Reports, is revised by deleting periodic reporting requirements for main steam safety/relief valve challenges to be consistent with Generic Letter 97-02. Section 5.7, High Radiation Area, is revised in accordance with 10 CFR 20.1601(c).

Exceptions to the TSTF:

Changes in TS section 5.2.2 related to working hour limits, unit staff qualifications, and some changes in section 5.5.4 related to effluents have already been incorporated into the existing Duane Arnold Energy Center (DAEC) TS, and therefore are not part of this submittal. Insert "G" of the TSTF to section 5.2.2 regarding the independent review of working hours has not been included. The insert states: "Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned." Justification for not including such a review was previously provided during the conversion to Improved Technical Specifications in DAEC letter NG-97-1798, dated November 16, 1997.

Basis for proposed No Significant Hazards Consideration:

The Commission has provided standard 10 CFR Section 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if the change would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

After reviewing this proposed amendment, NMC has concluded that no significant hazards exist for the following reasons:

- 1) The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This request for amendment to Duane Arnold Energy Center's TS provides for adoption of the NRC-approved generic change TSTF item TSTF-258, Revision 4. The Amendment request includes revisions to TS Section 5.0, "Administrative Controls," to delete details of staffing requirements, delete requirements for the STA as a separate position while retaining the function, revise the Radioactive Effluent Controls Program to be consistent with the intent of 10 CFR 20, delete periodic reporting requirements of challenges to main steam safety/relief valves, and revise radiological control requirements for radiation areas to be consistent with those specified in 10 CFR 20.1601(c).

The proposed TS changes are administrative in nature and do not impact the operation, physical configuration, or function of plant equipment or systems. The changes do not impact the initiators or assumptions of analyzed events, nor do they impact mitigation of accidents or transient events. Therefore, these proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS changes are administrative in nature and do not alter plant configuration, require that new equipment be installed, alter assumptions made about accidents previously evaluated or impact the operation or function of plant equipment or systems. The proposed changes do not introduce any new modes of plant operation or make any changes to system setpoints. The proposed changes do not create the possibility of a new or different kind of accident due to credible new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing bases. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated has not been created.

- 3) The proposed amendment will not involve a significant reduction in a margin of safety.

The proposed TS changes are administrative in nature and do not involve physical changes to plant structures, systems, or components (SSCs), or the manner in which these SSCs are operated, maintained, modified, tested, or inspected. The proposed changes do not involve a change to any safety limits, limiting safety system settings, limiting conditions for operation, or design parameters for any SSC. The proposed changes do not impact any safety analysis assumptions and do not involve a change in initial conditions, system response times, or other parameters affecting any accident analysis. Regarding the deletion of the requirement for the STA as a separate position, the function will be retained, so

there will be no reduction in the margin of safety. As a result, there is no significant reduction in a margin of safety.

Based on the above, we have determined that the proposed amendment will not involve a significant hazards consideration.

Local Public Document Room Location: Cedar Rapids Public Library, 500 First Street SE, Cedar Rapids, Iowa 52401.

Attorney for Licensee: Al Gutterman, Morgan Lewis, 1111 Pennsylvania Avenue, NW, Washington, D.C. 20004.

PROPOSED CHANGE TSCR-050 TO THE DUANE ARNOLD ENERGY CENTER
TECHNICAL SPECIFICATIONS

The holders of license DPR-49 for the Duane Arnold Energy Center propose to amend the Technical Specifications by deleting the referenced pages and replacing them with the enclosed new pages. Following this page are the marked-up pages for this change.

SUMMARY OF CHANGES:

<u>Page</u>	<u>Description of Changes</u>
5.0-3	Delete 5.2.2.a and reletter sections accordingly
5.0-4	Replace the title "Shift Technical Advisor (STA)" with "individual", delete "via the Operations Shift Manager", change "Shift" to "Unit Operations Shift Crew" and reletter the section
5.0-10	Revise section 5.5.4 to be consistent with 10 CFR 20
5.0-20	In Section 5.6.4 delete the requirement to include documentation of all challenges to the safety/relief valves in the Monthly Operating Reports
5.0-22 & 5.0-23	Replace entire section 5.7, "High Radiation Area," with new one that is in accordance with 10 CFR 20.1601(c)

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall also include the following:

~~a. A non-licensed operator shall be assigned to the reactor when containing fuel and an additional non-licensed operator shall be assigned to the reactor when operating in MODES 1, 2, or 3.~~

~~b. Shift crew composition shall meet the requirements stipulated herein and in 10 CFR 50.54(m).~~

~~b. 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 minimum requirements.~~

~~c. A person qualified to implement radiation protection procedures 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.~~

~~d. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), health physics technicians, 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 deviation from the working hour guidelines shall be authorized in advance by the responsible department manager or the responsible department manager's 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.~~

~~e. The Operations Manager or Operations Supervisors shall hold an SRO license.~~

(continued)

5.2 Organization

5.2.2 Unit Staff (continued) *An individual*

f *g.* *Unit Operations* ~~The Shift Technical Advisor (STA)~~ shall provide advisory technical support to the shift, ~~at the Operations Shift~~ *crew* ~~managed~~ in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. ~~In addition, the STA or the individual filling the STA position~~ shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. ~~The STA~~ function is not required in MODES 4 and 5. *This*

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary shall be limited to the following:
- 1. For noble gases: less than or equal to a dose rate of 500 mrem/yr to the ~~total~~ ^{whole} body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
 - 2. For iodine-131, iodine-133, tritium, and for all radionuclides in particulate form with half lives > 8 days: less than or equal to a dose rate of 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. 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 > 8 days in gaseous effluents released to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

From the site

ator

whole

, beyond the site boundary,

5.5.5

Component Cyclic or Transient Limit

This program provides controls to track the UFSAR Section 5.3.3, cyclic and transient occurrences to ensure that components are maintained within the design limits.

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

5.6 Reporting Requirements (continued)

5.6.3 Radioactive Material Release Report

The Radioactive Material Release Report covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODA and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

~~Routine reports of operating statistics and shutdown experience including documentation of all challenges to the safety/relief valves~~ shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
 1. The Average Planar Linear Heat Generation Rate (APLHGR) for Specification 3.2.1;
 2. The Minimum Critical Power Ratio (MCPR) for Specification 3.2.2; and
 3. Exclusion Region in the Power/Flow Map for Specification 3.4.1.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in General Electric Standard Application for Reactor Fuel, NEDE-24011-P-A, (GESTAR II). The revision number is the one approved at the time the reload fuel analyses are performed.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

5.7.1

~~Pursuant to 10 CFR 20, paragraph 20.1601(c), in lieu of the requirements of 10 CFR 20.1601, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP) or a work document which includes radiological requirements normally associated with a RWP. Individuals qualified in radiation protection procedures (e.g., health physics personnel) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.~~

~~Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:~~

- ~~a. A radiation monitoring device that continuously indicates the radiation dose rate in the area or that continuously monitors radiation dose rates and alarms when a preset dose rate is received and is capable of indicating radiation dose rate.~~
- ~~b. A radiation monitoring device that continuously monitors the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.~~
- ~~c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility radiation protection supervisor in the RWP.~~

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(continued)

5.7 High Radiation Area (continued)

5.7.2 In addition to the requirements of Specification 5.7.1, areas with radiation levels ≥ 1000 mrem/hr (at 30cm from the source of radioactivity) but < 500 rads/hr (at 1m from the source of radioactivity) shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Operations Shift Manager on duty or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP, or a work document which includes radiological requirements normally associated with a RWP, that shall specify the dose rate levels in the immediate work areas and the maximum allowable stay times for individuals in those areas. Health Physics personnel or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras or telemetry) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

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5.7.3 For individual high radiation areas with radiation levels of > 1000 mrem/hr (at 30cm from the source of radioactivity) but < 500 rads/hr (at 1m from the source of radioactivity), accessible to personnel, that are located within large areas such as reactor containment where no enclosure exists for purposes of locking, or that cannot be continuously guarded, and where no enclosure can be reasonably constructed around the individual area that individual area shall be barricaded and conspicuously posted, and a flashing light shall be activated as a warning device.

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~~TSTF 258~~

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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

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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; 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.

5.7.2 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

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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 with the means to communicate with and control every individual in the area, or
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; 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.

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- 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.

SAFETY ASSESSMENT

Introduction:

By letter dated February 8, 2002, Nuclear Management Company, LLC (NMC) submitted a request for revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). The proposed amendment requests revision of the administrative section of the TS per Technical Specification Task Force (TSTF), Item TSTF-258, Revision 4, titled "Changes to Section 5.0, Administrative Controls."

Background:

As part of a continuing effort to maintain and improve the use of TS, the industry and the Nuclear Regulatory Commission (NRC) staff have worked to develop generic changes to the Improved Standard Technical Specifications (ISTSS) (NUREGs 1430 through 1434). This process saves licensee and industry resources by addressing generic issues once, rather than on each plant docket, and by pre-identifying the information necessary to process the change. This improves the adoption process for generically acceptable changes.

Generic changes to the ISTS NUREGs are proposed by the Nuclear Energy Institute (NEI) TSTFs to the NRC. The TSTF includes representatives from the four U.S. commercial nuclear power plant Owners Groups, and NEI. Generic changes are prepared and reviewed using a process that the TSTF and the NRC developed to correct and improve the ISTS NUREGs. These proposed changes are assigned a number for tracking purposes, and are referred to as TSTFs (e.g., TSTF-2, TSTF-5, etc.). After NRC approval, these TSTFs are available for adoption by plants. TSTF-258, Revision 4, "Changes to Section 5.0, Administrative Controls," has been approved by the NRC. Periodically the NRC issues revisions to the ISTS NUREGs which incorporate the approved TSTFs. NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4", Revision 1, was issued April 30, 2001, and incorporates TSTF-258, Revision 4. This is the ISTS NUREG which applies to DAEC.

Evaluation:

The changes in TSTF-258 that DAEC proposes to adopt are to revise TS Section 5.0, "Administrative Controls", in four areas. The proposed changes include the following:

1. In section 5.2.2, delete the existing section 5.2.2.a, replace the specific STA title with "individual," and delete details of staffing requirements,
2. Revise section 5.5.4 to be consistent with 10 CFR 20,
3. Revise section 5.6.4 to remove the requirement to document safety/relief valve challenges in the Monthly Operating Reports,
4. Replace section 5.7 with a new one that is in accordance with 10 CFR 20.1601(c).

Note that TSTF-258 changes in Section 5.2.2 related to working hour limits, unit staff qualifications, and some changes in Section 5.5.4 related to effluents have already been incorporated into the existing DAEC TS and therefore are not part of this submittal. Also, Insert "G" of the TSTF to Section 5.2.2 regarding the independent review of working hours has not been included. The insert states: "Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned." Justification for not including such a review was previously provided during the conversion to Improved Technical Specifications in DAEC letter NG-97-1798, dated November 16, 1997.

Basis for change:

The justification given in the NRC-approved TSTF for deleting the staffing details provided in the existing section 5.2.2.a is that the requirements of 10 CFR 50.54(m)(2)(iii) and 50.54(k) adequately provide for shift manning. Regulation 10 CFR 50.54(m)(2)(iii) requires "When a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by the unit's technical specifications, each licensee shall have a person holding a senior operator license for a nuclear power unit in the control room at all times". Further, 10 CFR 50.54(k) requires "An operator or senior operator licensed pursuant to part 55 of this chapter shall be present at the controls at all times during the operation of the facility". The revised wording is consistent with NUREG-1433, Revision 2.

The title "Shift Technical Advisor (STA)" is replaced with the term "individual" in the NRC-approved TSTF so that it is not implied that the STA and the Shift Supervisor must be different individuals. Option 1 of the Commission Policy Statement on Engineering Expertise on Shift can be satisfied by assigning an individual with specified educational qualifications to each operating crew as one of the Senior Reactor Operators (SROs) required by 10 CFR 50.54(m)(2)(i) to provide the technical expertise on shift. The existing wording could be easily misinterpreted to require separate individuals. Therefore, the wording is revised so 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. The revised wording is consistent with NUREG-1433, Revision 2.

TS 5.5.4 on the Radioactive Effluent Controls Program is being modified to be consistent with the revision to 10 CFR 20. The DAEC TS have previously incorporated the TSTF changes to limitations on the dose rate resulting from radioactive material released in liquid and gaseous effluents to areas at or beyond the site boundary, except for minor wording changes which are administrative changes. In addition, the provisions of Surveillance Requirement (SR) 3.0.2 are 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 (31 days). Allowing a 25 percent extension in the frequency of performing the monthly cumulative dose and projected dose calculation for the current quarter/year will have no effect on the outcome

of the calculations. SR 3.0.3 is added in association with SR 3.0.2 to maintain consistency of the TS application.

For TS 5.6.4, Monthly Operating Reports, the NRC-approved TSTF indicates that information on safety/relief valve challenges is not required for the NRC Performance Indicator Program and therefore does not need to be reported in the Monthly Operating Reports.

TS Section 5.7, High Radiation Area, is revised in accordance with 10 CFR 20.1601(c) and is updated with acceptable alternate controls to those provided in 10 CFR 20.1601.

Summary:

Therefore, based on the above, NMC has concluded that the proposed revision to the DAEC TS is acceptable.

ENVIRONMENTAL CONSIDERATION

10 CFR Section 51.22(c)(9) identifies certain licensing and regulatory actions which are eligible for categorical exclusion from the requirement to perform an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents released offsite; and (3) result in a significant increase in individual or cumulative occupational radiation in individual exposure. Nuclear Management Company, LLC (NMC) has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22 (c)(9). Pursuant to 10 CFR Section 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9) for the following reasons:

1. As documented in Attachment 1 to this letter, the proposed amendment does not involve a significant hazards consideration.
2. The proposed Amendment revises administrative controls based upon an NRC-approved Technical Specification Task Force (TSTF) item. There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The operation of the plant is not being changed significantly by these administrative changes. Proposed changes to the Radioactive Effluent Controls Program and the High Radiation Area Section are based on 10 CFR requirements.
3. The proposed Amendment revises administrative controls based upon an NRC-approved TSTF. There is no significant increase in individual or cumulative occupational radiation exposure. The activities of plant personnel are not being significantly changed by these administrative changes. Proposed changes to the Radioactive Effluent Controls Program and the High Radiation Area Section are based on 10 CFR requirements.