

December 18, 1992

Docket No. 50-255

Mr. Gerald B. Slade
Plant General Manager
Palisades Plant
Consumers Power Company
27780 Blue Star Memorial Highway
Covert, Michigan 49043

Dear Mr. Slade:

SUBJECT: PALISADES PLANT - AMENDMENT NO. 154 TO FACILITY OPERATING LICENSE
NO. DPR-20 (TAC NO. M75060)

The Commission has issued the enclosed Amendment No. 154 to Facility Operating License No. DPR-20 for the Palisades Plant. The amendment consists of changes to the Technical Specifications (TS) in response to your letters dated October 13, 1989 and August 27, 1992.

The amendment revises the Palisades Plant TS to incorporate the guidance provided in NRC Generic Letter (GL) 89-01 for implementation of programmatic controls for Radiological Effluent Technical Specifications (RETS) in the Administrative Controls Section of the TS and the relocation of procedural details of RETS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP).

The amendment also changes the reporting requirement for major modifications to radioactive liquid, gaseous, and solid waste treatment systems from a special report to a 10 CFR 50.59 report.

A copy of our Safety Evaluation is also enclosed. The notice of issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by
Armando Masciantonio, Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 154 DPR-20
2. Safety Evaluation

cc w/enclosures:
See next page

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DATE	<i>11/2/92</i>	<i>12/3/92</i>	<i>12/2/92</i>	<i>12/11/92</i>

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

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Sincerely,

A handwritten signature in black ink, appearing to read "A.S. Masciantonio", is written above the typed name.

Armando Masciantonio, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 154 DPR-20
2. Safety Evaluation

cc w/enclosures:
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Palisades Plant

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DATED: December 18, 1992

AMENDMENT NO. 154 TO FACILITY OPERATING LICENSE NO. DPR-20-PALISADES

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

CONSUMERS POWER COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 154
License No. DPR-20

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consumers Power Company (the licensee) dated October 13, 1989 and August 27, 1992, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to the license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-20 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 154, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of January 1, 1993.

FOR THE NUCLEAR REGULATORY COMMISSION



Ledyard B. Marsh, Director
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 18, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 154

FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by the amendment number and contain marginal lines indicating the areas of change.

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MEMBER(S) OF THE PUBLIC

MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the utility, its contractors, or its vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries.

OFFSITE DOSE CALCULATION MANUAL (ODCM)

The OFFSITE DOSE CALCULATION MANUAL shall contain the current methodology and parameters used in the calculation of offsite doses due to radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip set points, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain the (1) Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Specification 6.8.4 and (2) descriptions of the information to be included in the Radiological Environmental Operating Report and the Radioactive Effluent Release Report required by Specification 6.9.3.

PROCESS CONTROL PROGRAM

The PROCESS CONTROL PROGRAM shall contain the current formula, sampling, analyses, tests, and determinations to be made to ensure that the processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR 20, 10 CFR 71, Federal and State regulations, and other requirements governing the disposal of the radioactive waste.

SITE BOUNDARY

The SITE BOUNDARY shall be that line beyond which the land is neither owned nor otherwise controlled by the licensee.

UNRESTRICTED AREA

An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials or, any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, or recreational purposes.

POWER DISTRIBUTION LIMITS

3.23.3 QUADRANT POWER TILT - T_q

LIMITING CONDITION FOR OPERATION

References

- (1) FSAR, Section 7.4.2.2
- (2) FSAR, Section 7.6.2.4

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Amendment No 88, 144, 154

TABLE 4.1.3
Minimum Frequencies for Checks, Calibrations and Testing of Miscellaneous Instrumentation and Controls (Cont'd)

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
1. Source Range Neutron Monitors	a. Check	S	a. Comparison of both channel count rate indications when in service.
	b. Test	P	b. Internal test signals.
	c. Calibrate	R	c. Channel alignment through measurement/adjustment of internal test points.
2. Primary Rod Position Indication System	a. Check	S	a. Comparison of output data with secondary RPIS.
accuracy. Check rod position interlocks.	b. Check	M	b. Check of power dependent insertion limits monitoring system.
	c. Calibrate	R	c. Physically measured rod drive position used to verify system
3. Secondary Rod Position Indication System	a. Check	S	a. Comparison of output data with primary RPIS.
	b. Check	M	b. Same as 2(b) above.
	c. Calibrate	R	c. Same as 2(c) above, including out-of-sequence alarm function.
4. Area Monitors	a. Check	D	a. Normal readings observed and internal test signals used to verify instrument operation.
	b. Calibrate	R	b. Exposure to known external radiation source.
	c. Test	M	c. Detector exposed to remote operated radiation check source or integral electronic check source.
5. Emergency Plan Radiation Instruments	a. Calibrate	A	a. Exposure to known radiation source.
	b. Test	M	b. Battery check.
6. (Deleted)			
7. Pressurizer Level Instruments	a. Check	S	a. Comparison of two wide and two narrow range independent level readings.
	b. Calibrate	R	b. Known differential pressure applied to sensor.
	c. Test	M	c. Signal to meter relay adjusted with test device.

4.10 REACTIVITY ANOMALIES

Applicability

Applies to potential reactivity anomalies.

Objective

To require evaluation of reactivity anomalies within the reactor.

Specifications

Following a normalization of the computed boron concentration as a function of burnup, the actual boron concentration of the primary coolant shall be periodically compared with the predicted value. If the difference between the observed and predicted steady-state concentrations reaches the equivalent of 1% in reactivity, the Atomic Energy Commission shall be notified within 24 hours and an evaluation as to the cause of the discrepancy shall be made and reported to the Atomic Energy Commission within 30 days.

Basis

To eliminate possible errors in the calculations of the initial reactivity of the core and the reactivity depletion rate, the predicted relation between fuel burnup and the boron concentration, necessary to maintain adequate control characteristics, must be adjusted (normalized) to accurately reflect actual core conditions. When rated power is reached initially, and with the control rod groups in the desired positions, the boron concentration is measured and the predicted curve is adjusted to this point. As power operation proceeds, the measured boron concentration is compared with the predicted concentration and the slope of the curve relating burnup and reactivity is compared with that predicted. This process of normalization shall be completed after about 10% of the total core burnup. Thereafter, actual boron concentration can be compared with prediction and the reactivity status of the core can be continuously evaluated. Any reactivity anomaly greater than 1% would be unexpected, and its occurrence would be thoroughly investigated and evaluated. The methods employed in calculating the reactivity of the core vs burnup and the reactivity worth of boron vs burnup are given in the FSAR.

The value of 1% is considered a safe limit since a shutdown margin of at least 2% with the most reactive rod in the fully withdrawn position is always maintained.⁽¹⁾

References

(1) FSAR, Section 3.3.2

4.11 (Deleted)

(Next page is 4-60)

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

- 6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 Quality Assurance Program Requirements, as endorsed by CPC-2A, Quality Program Description.
 - b. Refueling operations.
 - c. Surveillance and test activities of safety-related equipment.
 - d. Site Security Plan implementation.
 - e. Site Emergency Plan implementation.
 - f. Site Fire Protection Program implementation.
- 6.8.2 Procedures and changes shall be approved prior to implementation by the appropriate* senior department manager predesignated by the Plant General Manager subject to the reviews per Specifications 6.5.1.6 and 6.5.3.
- 6.8.3 Temporary changes to procedures of Specification 6.8.1 above may be made provided:
- a. The intent of the original procedure is not altered.
 - b. The change is approved by two members (or designated alternates) of the PRC, at least one of whom holds a Senior Reactor Operator License.
 - c. The change is documented, subsequently reviewed by Plant Safety and Licensing within 30 days of issuance and approved by the appropriate* senior department manager predesignated by the Plant General Manager.

* The determination of the appropriate senior department manager is based on the activities addressed by the specific procedure and will be predesignated in writing by the Plant General Manager.

ADMINISTRATIVE CONTROLS

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

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR 20, Appendix B, Table II, Column 2.
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
- 4) Limitation on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR 50,
- 5) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR 20, Appendix B, Table II, Column 1.
- 6) Limitations on the annual and quarterly air doses resulting from noble gaseous released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR 50,
- 7) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR 50,
- 8) 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.

ADMINISTRATIVE CONTROLS

6.8.4 (continued)

b. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verifications of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR 50, and (3) including the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM.
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

ADMINISTRATIVE CONTROLS

6.9 Reporting Requirements

Reports and other written communications shall be submitted to the NRC in accordance with the requirements of 10 CFR 50.4.

6.9.1 Routine Reports

- a. Start-Up Report - A summary report of plant start-up and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier and, (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant. The report shall address each of the required tests and shall, in general, include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Start-up reports shall be submitted within (1) 90 days following completion of the start-up test program, (2) 90 days following resumption or commencement of commercial power operation or, (3) 9 months following initial criticality, whichever is earliest. If the Start-Up Report does not cover all three events (i.e., initial criticality, completion of start-up test program and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

- b. Annual Report - An annual report covering occupational exposure during the current calendar year to supplement requirements of 10 CFR 20.407 should be submitted prior to March 1 of each year.

This annual report shall include:

A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mRem/year and their associated man Rem exposure according to work and job functions, eg, reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

ADMINISTRATIVE CONTROLS

6.9.1 Routine Reports (continued)

- c. Monthly Operating Report - Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the NRC to arrive no later than the fifteenth of each month following the calendar month covered by the report.

d. Radioactive Effluent Release Report

The Radioactive Effluent Release Report shall be submitted 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 (1) consistent with the objectives outlined in the ODCM and PROCESS CONTROL PROGRAM and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR 50.

e. Radiological Environmental Operating Report

The Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR 50.

6.9.2 Reportable Events

The Commission shall be notified of Reportable Events and a report submitted pursuant to the requirements of 10 CFR 50.73.

6.9.3 Nonroutine Reports

A report shall be submitted in the event that (a) the Radiological Environmental Monitoring Programs are not substantially conducted as described in the ODCM or (b) an unusual or important event occurs from plant operation that causes a significant environmental impact or affects a potential environmental impact. Reports shall be submitted within 30 days.

(Next page is 6-26)

ADMINISTRATIVE CONTROLS

6.9 Reporting Requirements (continued)

6.9.4 Special Reports

- a. Special Reports shall be submitted to the NRC covering the activities identified below pursuant to the requirements of the applicable referenced specifications:

<u>Area</u>	<u>Specification Reference</u>	<u>Reporting Due</u>
Prestressing, Anchorage, Liner and Penetration Tests	4.5.4 4.5.5	90 Days After Completion of the Test*

*A test is considered to be complete after all associated mechanical, chemical, etc., tests have been completed.

- b. Special reports shall be submitted in accordance with 10 CFR 50.4, within the time period specified for each report.

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated:

6.10.1 The following records shall be retained for at least five years:

- Records and logs of facility operation covering time interval at each power level.
- Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- All reportable events as defined in Section 6.9.2.
- Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

ADMINISTRATIVE CONTROLS

- k. Records of secondary water sampling and quality.
- l. Records of the service lives of all hydraulic and mechanical snubbers covered by Specification 3.20. This shall include the date at which the service life commences and associated installation and maintenance records.
- m. Records of training and qualifications for members of the plant staff.
- n. Records of reactor tests and experiments.
- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20, and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by 10 CFR 20.203(c)(2), each high radiation area in which the intensity of radiation is greater than 100 mRem/hr but less than 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." 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 which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates 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 level in the area has been established and personnel have been made knowledgeable of them.

*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties provided they comply with approved radiation protection procedures for entry into high radiation areas.

ADMINISTRATIVE CONTROLS

6.18 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after the review and acceptance by the PRC and the approval of the Plant General Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.19 PROCESS CONTROL PROGRAM

Changes to the PROCESS CONTROL PROGRAM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s) and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the PRC and approval of the Plant General Manager.

ADMINISTRATIVE CONTROLS

6.20 (Deleted)

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
December 18, 1992

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 154 TO FACILITY OPERATING LICENSE NO. DPR-20
CONSUMERS POWER COMPANY
PALISADES PLANT
DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated October 13, 1989, Consumers Power Company (CPCo or the licensee) proposed to incorporate programmatic controls for radiological effluents and radiological environmental monitoring in the Administrative Controls Section of the Technical Specification (TS) consistent with the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. At the same time, the licensee proposed to transfer the procedural details of the Radiological Effluent Technical Specifications (RETS) from the TS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP) for solid radioactive wastes as appropriate. With these changes, the specifications related to RETS reporting requirements were simplified. Finally, changes to the definitions of the ODCM and PCP were proposed consistent with these changes. Guidance on these proposed changes was provided to all power reactor licensees and applicants by Generic Letter (GL) 89-01 dated January 31, 1989. Additional clarifications were provided in a letter dated August 27, 1992.

2.0 EVALUATION

The licensee's proposed changes to the TS are in accordance with the guidance provided in GL 89-01 and are addressed below.

- (1) The licensee has proposed to incorporate programmatic controls for radioactive effluents and radiological environmental monitoring in Specification 6.8.4, "Procedures and Programs," of the TS as noted in the guidance provided in GL 89-10. The programmatic controls ensure that programs are established, implemented, and maintained to ensure that operating procedures are provided to control radioactive effluents consistent with the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50.
- (2) The licensee has confirmed that the detailed procedural requirements addressing Limiting Conditions for Operation, their applicability, remedial actions, associated surveillance requirements, or reporting requirements for the following specifications have been prepared to implement the relocation of procedural details to the ODCM or PCP. These changes to the ODCM and PCP have been prepared in accordance with

the new Administrative Controls Section in the TS on changes to the ODCM and PCP so that they will be implemented in the ODCM or PCP when this amendment is issued.

<u>SPECIFICATION</u>	<u>TITLE</u>
3/4.24.1	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION
3/4.24.2	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
3/4.24.3	LIQUID EFFLUENTS CONCENTRATION
3/4.24.4	LIQUID EFFLUENTS DOSE
3/4.24.5	GASEOUS EFFLUENTS DOSE
3/4.24.5.1	GASEOUS EFFLUENTS DOSE: DOSE RATE
3/4.24.5.2	GASEOUS EFFLUENTS DOSE: NOBLE GASES
3/4.24.5.3	GASEOUS EFFLUENTS DOSE: DOSE - IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM
3/4.24.6	GASEOUS WASTE TREATMENT SYSTEM
3/4.24.7	SOLID RADIOACTIVE WASTES
3/4.24.8	TOTAL DOSE
4.11	RADIOLOGICAL ENVIRONMENTAL MONITORING
4.11.1	RADIOLOGICAL ENVIRONMENTAL MONITORING: MONITORING PROGRAM
4.11.3	RADIOLOGICAL ENVIRONMENTAL MONITORING: LAND USE CENSUS
4.11.5	RADIOLOGICAL ENVIRONMENTAL MONITORING: INTERLABORATORY COMPARISON PROGRAM
6.9.3.1B	ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT
6.9.3.1A	SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT
6.20	MAJOR MODIFICATIONS TO RADIOACTIVE LIQUID, GASEOUS, AND SOLID WASTE TREATMENT SYSTEMS

The above procedural details that have been removed from the TS are not required by the Commission's regulations to be included in the TS. They have been prepared for incorporation in the ODCM or PCP upon issuance of this license amendment and may be subsequently changed by

the licensee without prior NRC approval. Changes to the ODCM and PCP are documented and will be retained for the duration of the operating license in accordance with Specification 6.10.2.o.

In addition to relocating TS 6.20 (Standard Technical Specification (STS) 6.15), major modification to radioactive liquid, gaseous, and solid waste treatment systems, to the ODCM and the PCP, changes have been made to the reporting requirement. Present TS 6.20 requires special reporting to the NRC within six months of the time a safety evaluation for a major modification to the radwaste system was reviewed by the Plant Review Committee (PRC). The revised reporting requirement, now in the ODCM and PCP, no longer specifies a special report but instead requires the reporting of a major modification pursuant to 10 CFR 50.59. This change (found in ODCM Appendix A section V.A.1) meets the requirements of Enclosure 1 to GL 89-01 as it follows the requirements of new Specifications 6.19a(1) and (2) for changes to the ODCM and to the PCP.

- (3) The licensee has proposed replacing the existing specifications in the Administrative Controls Section of the TS for the Annual Radiological Environmental Operating Report, Specification 6.9.3.1B, for the Radioactive Effluent Release Report, Specification 6.9.3.1A, for the PCP, Specification 6.19, and for the ODCM, Specification 6.18 with the updated specifications that were provided in GL 89-01.

In addition, the October 13, 1989, submittal included a request for an exemption to the 60-day reporting requirement of 10 CFR 50.36(a)(2). During discussions with the NRC staff, the licensee was informed that this exemption request could not be approved. Consequently, by letter dated August 27, 1992, the licensee withdrew its request for the exemption to the 60-day reporting requirement of 10 CFR 50.36.(a)(2).

On the basis of the above, the staff finds that the changes included in the proposed TS amendment request are consistent with the guidance provided in GL 89-01. Because the control of radioactive effluents continues to be limited in accordance with operating procedures that must satisfy the regulatory requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50, the NRC staff concludes that this change is administrative in nature and there is no impact on plant safety as a consequence. Accordingly, the staff finds the proposed changes acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (55 FR 4262). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

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

Principal Contributor: T. Dunning
M. Gamberoni

Date: December 18, 1992