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April 22, 2002  
E910-02-014

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: Saxton Nuclear Experimental Corporation Facility (SNEC)  
Operating License No. DPR-4  
Docket No. 50-146  
Technical Specification Change Request No. 62

In accordance with 10 CFR 50.4(b)(1), please find enclosed Technical Specification Change Request (TSCR) No. 62.

GPU Nuclear requests that several changes be made to the SNEC Facility Technical Specifications to allow removal of the SNEC Facility Containment Vessel upper dome following Final Status Survey, including NRC acceptance of the results, of the below grade portions of the Containment Vessel. An evaluation of the proposed changes is included as Attachment 1. The revised Technical Specification pages are provided as Attachment 2.

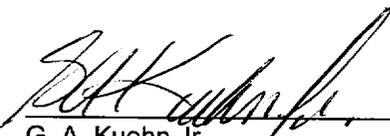
TSCR No. 62 has been reviewed pursuant to 10 CFR 50.91(a)(1) and an analysis supporting a determination of no significant safety hazards is included. Pursuant to 10 CFR 50.91(b), copies of this TSCR and supporting analysis, which indicates no significant hazards consideration is involved, have been provided to the designated representatives of the Commonwealth of Pennsylvania, Bureau of Radiation Protection, as well as the chief executives of the township and county in which the facility is located.

GPU Nuclear requests that the amendment authorizing TSCR No. 62 become effective upon NRC acceptance of the Final Status Survey of the lower portions of the SNEC Facility Containment Vessel. If you have any questions or require additional information regarding this license amendment, please contact Mr. James Byrne at (717) 948-8461.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Executed on: 04/22/02

  
G. A. Kuehn Jr.  
Vice President, SNEC

A001

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Attachments: 1) Evaluation of Changes  
2) Revised License and Technical Specification pages

cc: Regional Administrator – NRC Region I  
NRC Project Manager, NRR  
NRC Project Scientist, Region I  
Chairman, Board of Supervisors, Liberty Township  
Chairman, Board of County Commissioners, Bedford County  
Director, Bureau of Radiation Protection, PA Department of Environmental Protection

# Attachment 1

## Evaluation of Changes

### I. Technical Specification Change Request (TSCR) No. 62

GPU Nuclear requests the following changed replacement pages be inserted into the existing Technical Specifications:

Pages 1,3,4,5,6,11,13 and 20

### II. Reason for Proposed Change

The overall purpose of this TSCR is to permit removal of the SNEC Facility Containment Vessel upper dome prior to License Termination.

Initial planning for the SNEC Facility decommissioning project assumed that the concrete internal to the containment vessel could be decontaminated to below the Derived Concentration Guideline Level Values (DCGL's) for the SNEC Facility. Following this the remaining internal structures could then be used to access the upper Containment Vessel dome to perform remediation and Final Status Survey. However, in the process of remediating Containment Vessel concrete it was determined that all of the internal containment vessel concrete would need to be removed. This will make access to the upper Containment Vessel dome for remediation and Final Status Survey much more difficult and hazardous to personnel.

Thus, GPU Nuclear has modified it's planning for SNEC Facility decommissioning. Following completion of the current concrete removal project, GPU Nuclear will remediate and perform a final status survey of the lower portion of the containment vessel. Following NRC acceptance of the survey results, GPU Nuclear will backfill the lower containment vessel and appropriately seal/isolate the backfill to preclude recontamination. Following this effort, GPU Nuclear will remove the upper portion of the containment vessel to at least three (3) feet below grade and perform an appropriate resurvey of the backfilled lower containment vessel to ensure it continues to meet the defined release limits.

In order to execute this plan, certain changes to the SNEC Facility Technical Specifications to delete requirements associated with the Containment Vessel and the associated Decommissioning Support Facility is needed, as described below.

### III. Description of Change and Safety Evaluation Justifying Changes

Technical Specification 1.0.1 would be revised as follows:

Specification 1.0.1 CONTAINMENT VESSEL

Term used to describe the vertical steel cylinder which ~~houses~~ *housed* the Saxton Nuclear Experimental Corporation Facility Nuclear Steam Supply System (NSSS) and related components, also known as the CV.

This change is administrative in nature. Specification 1.0.1 has been changed to reflect the fact that the NSSS has been removed from the CV. The definition is being maintained in Technical Specifications due to the requirement to maintain records of entries.

Technical Specification 1.0.2 (CV Secured) is being deleted.

This change is administrative in nature. Specification 1.0.2, which defines the term CV Secured, is no longer needed as all the specifications, which require that the CV be secured, are deleted.

Technical Specification 1.0.4 (Decommissioning Support Facility (DSF) and Decommissioning Support Building (DSB)) is being deleted.

This change is administrative in nature. Specification 1.0.4, which defines the terms Decommissioning Support Facility (DSF) and Decommissioning Support Building (DSB), is no longer needed as all the specifications which refer to these terms are deleted.

Technical Specification 1.0.5 (Exclusion Area) is being deleted.

This change is administrative in nature. Specification 1.0.5, which defines the term Exclusion Area, is no longer needed as all the specifications, which require an Exclusion Area, are deleted.

Technical Specification 1.0.14 (Secured) is being deleted.

This change is administrative in nature. Specification 1.0.14 which defines the term Secured is no longer needed as all the specifications which require that the securing of various SNEC Facility structures are deleted.

Technical Specification 1.1.2 (Exclusion Area Boundary) is being deleted.

The concept of exclusion and exclusion areas as it applies to the SNEC Facility site was originally addressed in the "Saxton Decommissioning Plan and Safety Analysis Report", April 1972. This document defined areas requiring exclusion as those exceeding 0.4 mrad/hr and contamination levels greater than those specified in Table IV from "Guidelines for decontamination of facilities and equipment prior to release for unrestricted use or termination of license for by-product, source or special nuclear material" USAEC, Division of Materials Licensing, dated April 27, 1970.

Nuclear Regulatory Commission regulations and guidance have changed considerably since 1970. Current regulation 10 CFR 20.1301 prescribes

that the total effective dose equivalent (TEDE) to individual members of the public from licensed operation will not exceed 0.1 rem in a year. In addition the dose in any unrestricted area from external sources will not exceed 0.002 rem in any one hour. Additionally 10 CFR 20.1402 establishes a TEDE of 25 mrem per year to release a site for unrestricted use and termination of the license.

Based on the above there are clearly two separate criteria for defining unrestricted areas, one while a license is in place and one following license termination. As the SNEC Facility will continue to be a licensed facility during removal of the containment vessel upper dome the criteria of 10 CFR 20.1301 apply and more specifically the dose rate criteria of 0.002 rem/hour. Currently the operating floor of the SNEC Facility containment vessel satisfies this criterion while some portions of the lower levels of the containment vessel do not. Following removal of the concrete, Final Status Survey and backfilling of the lower portions of the Containment Vessel there will no longer be any portion of the SNEC Facility site that will have dose rates in excess of 0.002 rem/hour. Therefore the need to maintain an exclusion area will no longer exist. Thus this technical specification can be deleted.

Technical Specification 1.1.3 (Exclusion Area Controls), including sub-specification paragraphs 1.1.3.1, 1.1.3.2 and 1.1.3.3 are being deleted.

This change is administrative in nature. Specification 1.1.3 simply defines the controls needed to maintain the Exclusion Area Boundary. Therefore as Specification 1.1.2 Exclusion Area Boundary has been deleted there is no longer a need for exclusion area controls.

Technical Specifications 2.1.1 and 2.1.2 would be revised as follows:

Specification 2.1.1

~~During activities within the CV/DSB~~ involving removal of the upper dome of the CV that have the potential to cause a MEASURABLE RELEASE to the environment of airborne radioactivity, the ~~CV/DSB ventilation system~~ appropriate ventilation will be operating in a manner such that the release pathway is via the monitored ventilation system exhaust.

Specification 2.1.2

When the ~~CV/DSB~~ ventilation exhaust is in operation, the exhaust monitoring instrumentation will be operated simultaneously. The ventilation system will be shutdown if the exhaust monitoring instrumentation is inoperable.

These changes are required in order to demolish the upper dome of the CV, which may also require demolition of some portions of the DSF. The existing CV/DSB ventilation system was designed to provide appropriate controls for the intact CV/DSB complex. Demolition of the CV will

invalidate this design. However the need to control and monitor potential measurable releases still exist and has been retained. Thus during demolition activities that involve cutting, burning or grinding on radiologically contaminated portions of the upper dome of the CV local ventilation controls will be established to ensure the area is ventilated, filtered and monitored. Conversely cutting, welding or grinding on portions of the upper dome of the CV which have been determined to contain no radiological contamination by appropriate surveys will not require such controls.

Technical Specification 3.2.2 will be revised as follows:

The RSO or a GRCS shall be present on site whenever ~~CV entry,~~ PRODUCTION ACTIVITIES, maintenance, characterization and/or RADIOACTIVE WASTE MANAGEMENT ACTIVITIES are being performed in Radiologically Controlled Areas (RCA's).

This change is administrative in nature. With the demolition of the CV there would be no entry to control. Additionally demolition of the upper dome of the CV would fall under the definition of PRODUCTION ACTIVITIES and thus the RSO or a GRCS shall be present on site.

Technical Specification 3.5.3 will be revised as follows:

### 3.5.3 Inspection

3.5.3.1 Facility inspections shall be performed in accordance with approved procedures. The inspection activities shall include:

~~a Verification that EXCLUSION AREA access points are SECURED at the completion of each authorized entry. (Deleted)~~

~~b. Verification of the OPERABILITY of the EXCLUSION AREA intrusion alarms shall be performed quarterly. (Deleted)~~

c. The station ventilation system effluent particulate monitor channel checks, source checks, channel test and channel calibration shall be performed at a frequency specified in the ODCM.

d. The ventilation system HEPA Filter will be tested to verify efficiencies in accordance with the requirements of the ODCM.

This change is administrative in nature. Specifications 3.5.3.1.a and 3.5.3.1.b simply define the controls associated with the Exclusion Area. Therefore as Specification 1.1.2 Exclusion Area Boundary has been deleted there is no longer a need for these exclusion area controls.

Technical Specification 3.6.1.3.3 will be revised as follows:

Facility Inspections and access controls shall meet specific requirements of the sections 3.5.3 and 4.1.3 respectively, of these TS.

This change is administrative in nature. As specification 1.1.3 is being deleted by this change any reference to it should also be deleted.

Technical Specification Figure 1 (Saxton Nuclear Experimental Corp. Facility Layout) is being deleted.

This change is administrative in nature. Figure 1 is referred to by specification 1.1.2 (Exclusion Area Boundary) which is also being deleted.

#### IV. No Significant Hazards Consideration

GPU Nuclear has determined that Technical Specification Change Request No. 62 involves no significant hazard consideration as defined in 10 CFR 50.92.

1. The proposed changes to the SNEC Technical Specifications do not involve a significant increase in the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously analyzed in the safety analysis report.

As described in the change to delete Technical Specification 1.1.2, radiation levels inside the Containment Vessel will be below that necessary to maintain the Containment Vessel as an Exclusion Area. Further as required by modified Technical Specification 2.1.1 ventilation controls will be established to monitor and control any potential releases of airborne radioactivity during activities involving removal of the upper dome. Finally an analysis has been performed to determine the dose to a maximally exposed individual due to an accidental release while cutting the Containment Vessel.

In developing a source term for the event it was assumed that following the concrete removal process the interior surfaces of the upper Containment Vessel dome was homogeneously coated with concrete dust. NUREG 1507 "Minimum Detectable Concentrations with Typical Radiation Survey Instruments for Various Contaminants and Field Conditions" describes an experiment to determine the attenuation effects due to dusty conditions. The maximum dust loading presented was 9.99 mg/cm<sup>2</sup> for soil. This value was converted to concrete dust by comparing the relative densities of the material (1.5 g/cm<sup>3</sup> for soil and 2.3 g/cm<sup>3</sup> for concrete) or 15.3 mg/cm<sup>2</sup>. This amount of dust coating the internal surfaces of the Containment Vessel dome (9.05E6 cm<sup>2</sup>) results in 299 pounds of dust being left in the Containment Vessel.

Table 1 provides the mix of isotopes remaining at the SNEC Facility based on the most recent survey results and isotope decay. During the removal

operation a resuspension factor of  $1.9E-2/m$  (as described in NUREG/CR 0130 "Technology, Safety and Costs of Decommissioning a Reference Pressurized Water Reactor Power Station", Volume 2, page J-27) was selected to represent the amount of concrete dust going airborne. This parameter is about one order of magnitude larger than that used in any other accident analyses described in the NUREG. This entire volume of dust was assumed to be released, unfiltered, directly to the environment.

An accident dispersion Factor ( $\chi/Q$ ) of  $3.41E-3 \text{ sec}/m^3$ , was also selected as it is the highest, thus most conservative, value used in the SNEC Facility Offsite Dose Calculation Manual (ODCM). Additionally composite dose conversion factors were selected from Table 5-1 of EPA 400-R-92-001 "Manual of Protective Action Guides and Protective Guides for Nuclear Incidents" (US EPA, May 1992).

Based on the above a calculated dose of  $3.23E-4 \text{ mrem}$  to the maximally exposed individual represents a conservative estimate for an accidental release. For comparison Section 3.1 of the SNEC Facility USAR estimated the dose from an unfiltered release due to a material handling event of  $1.5 \text{ mrem}$  to the maximally exposed individual.

Thus this proposed change does not involve a significant increase in the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously analyzed in the SNEC Facility USAR.

2. The proposed changes to the SNEC Technical Specifications will not create the possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report.

As described in the response to item 1 above, the limiting accidental release during segmentation of the Containment Vessel dome involves the direct release of radioactive material to the environment. This event is similar to both a material handling event as described in Section 3.1 of the SNEC Facility USAR, and loss of engineering controls during segmentation as described in Section 3.4 of the SNEC Facility USAR. Thus the possibility of a new accident is not created.

3. The changes will not involve a significant reduction in the margin of safety as defined in the basis for any technical specification for SNEC. The SNEC Facility Technical Specifications do not contain a defined margin of safety. However the implied margin of safety is to protect members of the public from exposure to radioactive material.

At the point in time that these Technical Specifications would take effect general radiation levels in the SNEC Facility Containment Vessel would be such that the Containment Vessel could be opened for unrestricted use as defined in 10CFR20.1301. Additionally the dose to a maximally exposed individual from an accidental release during removal of the Containment Vessel dome is several orders of magnitude below that from the limiting

accidents defined in the SNEC Facility USAR. Thus the margin of safety is not reduced.

V. Implementation

GPU Nuclear requests that the amendment authorizing TSCR No. 62 become effective upon NRC acceptance of the Final Status Survey of the SNEC Facility Containment Vessel lower head.

Table 1

Maximum Exposed Individual Dose from Cutting the CV.

Isotope	CV Concrete Activity (Ci) per Table 4.13 SNEC Char. Report	Fraction Remaining as Dust (uCi) <sup>1</sup>	CV Wall Area Concentration (uCi/m <sup>2</sup> ) <sup>2</sup>	CV Air Concentration (uCi/m <sup>3</sup> ) <sup>3</sup>	Instantaneous Release Rate (uCi/sec) <sup>4</sup>	Concentration (uCi/cm <sup>3</sup> ) @200m <sup>5,6</sup>	DCF <sup>7</sup> (rem/uCi·cm <sup>-3</sup> ·sec)	Offsite Dose (mrem)
Am-241	8.24E-05	4.68E-03	5.17E-06	9.83E-08	2.93E-04	9.99E-13	1.47E+05	1.47E-04
Co-60	4.60E-02	2.61E+00	2.89E-03	5.49E-05	1.63E-01	5.57E-10	7.50E+01	4.18E-05
Cs-137	2.38E-01	1.35E+01	1.49E-02	2.84E-04	8.46E-01	2.88E-09	1.14E+01	3.28E-05
C-14	5.74E-03	3.26E-01	3.60E-04	6.84E-06	2.04E-02	6.96E-11	6.94E-01	4.83E-08
Eu-152	1.42E-03	8.07E-02	8.91E-05	1.69E-06	5.05E-03	1.72E-11	7.50E+01	1.29E-06
H-3	1.29E-01	7.33E+00	8.10E-03	1.54E-04	4.58E-01	1.56E-09	2.14E-02	3.34E-08
Ni-63	3.93E-02	2.23E+00	2.47E-03	4.69E-05	1.40E-01	4.76E-10	2.11E+00	1.01E-06
Pu-239	5.24E-05	2.98E-03	3.29E-06	6.25E-08	1.86E-04	6.35E-13	1.44E+05	9.17E-05
Pu-241	1.84E-04	1.05E-02	1.15E-05	2.19E-07	6.54E-04	2.23E-12	2.75E+03	6.13E-06
Sr-90	1.59E-04	9.03E-03	9.98E-06	1.90E-07	5.65E-04	1.93E-12	4.44E+02	8.56E-07
<b>Total</b>	<b>4.60E-01</b>	<b>2.61E+01</b>			<b>1.63E+00</b>			<b>3.23E-04</b>

Footnotes:

1. Fraction remaining determined by: (299 lbs dust/5.26E6 lbs total concrete in CV) x 1E6 uCi/Ci x CV concrete activity.
2. Area concentration determined by dividing dust fraction remaining by 9.05E2 (surface of CV shell being removed).
3. Air concentration determined by multiplying CV wall area activity by 1.9E-2/m (NUREG 0130 resuspension factor for dust sweeping)
4. Calculated by multiplying CV air specific activity by CV volume (2.98E3 m<sup>3</sup>) instantaneously released in one second.
5. Maximum atmospheric dispersion factor (X/Q) is 3.41E-3 sec/m<sup>3</sup> at the site boundary (200 meters) and in Sector N per SNEC ODCM Revision 5.
6. Calculated by multiplying X/Q x activity released in uCi/sec x 1e-6 m/cm<sup>3</sup>.
7. Per EPA 400-R-92-001, Table 5-1

**Attachment 2**  
**Revised Technical Specification Changes**

1.0 DEFINITIONS

1.0.1 CONTAINMENT VESSEL -

Term used to describe the vertical steel cylinder which housed the Saxton Nuclear Experimental Corporation Facility Nuclear Steam Supply System (NSSS) and related components, also known as the CV.

1.0.2 Deleted

1.0.3 DECOMMISSIONING ACTIVITIES -

The term DECOMMISSIONING ACTIVITIES describes all of those activities needed to decommission the SNEC Facility and return the site to unrestricted use. Examples of these activities include; PRODUCTION ACTIVITIES needed to conduct decommissioning such as physical dismantlement; radioactive waste preparation, treatment, packaging and shipment; radiation protection activities, construction and installation of support systems, structures and components, and final status survey.

1.0.4 Deleted

1.0.5 Deleted

1.0.11 PROCESS CONTROL PROGRAM (PCP) -

The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analyses, test, and determinations to be made to ensure that 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 Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

1.0.12 PRODUCTION ACTIVITIES -

PRODUCTION ACTIVITIES include all of the physical activities needed to conduct the decommissioning of the SNEC facility site. Included are such activities as the removal of systems, structures and components, demolition of structures and associated components, removal of contaminants to allow free release, excavation, trenching and removal of underground facilities.

These activities are a sub-set of DECOMMISSIONING ACTIVITIES.

1.0.13 RADIOACTIVE WASTE MANAGEMENT ACTIVITIES -

The term RADIOACTIVE WASTE MANAGEMENT ACTIVITIES is defined as those activities which involve the handling of radioactive waste materials.

1.0.14 Deleted

1.0.15 SITE BOUNDARY -

The SITE BOUNDARY used as the basis for the limits on the release of gaseous effluents is the line formed by a 200 meter radius from the center of the containment vessel.

1.0.16 SNEC -

The term SNEC is an acronym for the Saxton Nuclear Experimental Corporation.

1.0.17 SUBSTANTIVE CHANGE(S) -

SUBSTANTIVE CHANGE(S) are those which affect the activities associated with a document or the document's meaning or intent. Examples of non-substantive changes are: (1) correcting spelling; (2) adding (but not deleting) sign-off spaces; (3) blocking in notes, cautions, etc.; (4) changes in corporate and personnel titles which do not reassign responsibilities and which are not referenced in the Technical Specifications; and (5) changes in nomenclature or editorial changes which clearly do not change function, meaning or intent.

1.0.18 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, and/or recreational purposes.

As used here the term is used as it applies to radioactive effluents. The definitions as they apply to 10CFR Parts 20 and 100 still apply.

1.1 SITE

1.1.1 Location

The Saxton Nuclear Experimental Corporation (SNEC) facility is on a 1.148 acre tract deeded from the Pennsylvania Electric Company to the SNEC. It is located within the property of the Pennsylvania Electric Company near the Borough of Saxton, Pennsylvania, in Liberty Township, Bedford County, Pennsylvania. The Pennsylvania Electric Company property consists of approximately 150 acres along the Raystown Branch of the Juniata River.

1.1.2 Deleted

1.1.3 Deleted

1.1.3.1 Deleted

- 1.1.3.2 Deleted
- 1.1.3.3 Deleted

## 2.0 PRINCIPAL ACTIVITIES

Activities permitted at the SNEC facility shall include the routine and emergency inspections, maintenance associated with the possession of the SNEC facility, characterization activities and activities delineated in section 1.0.3, DECOMMISSIONING ACTIVITIES, of these Technical Specifications.

### 2.1 Limiting Conditions for Performing DECOMMISSIONING ACTIVITIES

- 2.1.1 During activities involving removal of the upper dome of the CV that have the potential to cause a MEASURABLE RELEASE to the environment of airborne radioactivity, appropriate ventilation will be operating in a manner such that the release pathway is via the monitored ventilation system exhaust.
- 2.1.2 When the ventilation exhaust is in operation, the exhaust monitoring instrumentation will be operated simultaneously. The ventilation system will be shutdown if the exhaust monitoring instrumentation is inoperable.
- 2.1.3 Verification by analysis that release criteria have been satisfied is required prior to making any batch release of liquid waste process effluent. Effluent release calculations will be made in accordance with the OFFSITE DOSE CALCULATION MANUAL.

## 3.0 ADMINISTRATIVE CONTROLS

### 3.1 Organization and Responsibilities

GPU NUCLEAR has the responsibility for safely performing DECOMMISSIONING ACTIVITIES. Lines of authority, responsibility and communication are procedurally defined and established. The relationships shall be identified and updated, as appropriate, in organizational charts, departmental functional responsibility and relationship descriptions, job descriptions for key

personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the SNEC Facility USAR.

- 3.1.1 The GPU NUCLEAR Cognizant Officer is responsible for and provides full-time dedicated staff for the purpose of conducting all activities safely, effectively and in accordance with corporate policies, applicable laws, regulations, licenses and Technical Specifications (TSs).
- 3.1.2 The Program Director SNEC Facility is responsible for administration of all SNEC facility functions, for direction of all DECOMMISSIONING ACTIVITIES, and for assuring that the requirements of License No. DPR-4 and these TSs are implemented.
- 3.1.3 The SNEC Facility Site Supervisor provides on-site management and continuing oversight of PRODUCTION ACTIVITIES.
- 3.1.4 The Radiation Safety Officer (RSO) is responsible for the conduct and oversight of all SNEC radiation safety activities through implementation of the Radiation Protection Plan. All radiological controls personnel shall have stop work authority in matters relating to or impacting radiation safety.
- 3.1.5 The Group Radiological Controls Supervisor (GRCS) directly supervises radiation safety activities.
- 3.1.6 Other GPU Inc. personnel provide SNEC facility management with technical support, project management capabilities and manpower.

3.2 Facility Staffing Requirements:

- 3.2.1 At least two individuals, one of which must be knowledgeable in radiation monitoring and the radiological hazards associated with the facility, shall perform radiological surveys necessary to support the initial entry into the CV for the day.
- 3.2.2 The RSO or a GRCS shall be present on site whenever PRODUCTION ACTIVITIES, maintenance, characterization and/or RADIOACTIVE WASTE MANAGEMENT ACTIVITIES are being performed in Radiologically Controlled Areas (RCA's).

- a Deleted
- b. Deleted
- c. The station ventilation system effluent particulate monitor channel checks, source checks, channel test and channel calibration shall be performed at a frequency specified in the ODCM.
- d. The ventilation system HEPA Filter will be tested to verify efficiencies in accordance with the requirements of the ODCM.

3.5.4 Audits

The audit function is independent of the SNEC facility management. Audits shall be performed by qualified individuals, as a minimum, for those activities designated within the scope of the SNEC facility's Quality Assurance Program. Audits are generally conducted biennially, however, frequency is based on the level of activity at the SNEC facility. Audits may also be performed at the request of the GPU NUCLEAR Cognizant Officer. Audits are performed in accordance with approved Quality Assurance Plan procedures. The audit procedures identify areas which may be included in the audit scope. Audit reports shall be forwarded to the GPU NUCLEAR Cognizant Officer within 60 days of completion of the audit.

3.5.5 TMI-2/SNEC Oversight Committee

3.5.5.1 The TMI-2/SNEC Oversight Committee shall report to the GPU NUCLEAR Cognizant Officer. The Committee will consist of at least four members. Membership will be on the recommendation of the Committee Chairman and approval of the GPU NUCLEAR Cognizant Officer. Three members shall constitute a quorum.

3.5.5.2 It shall be responsible to provide independent overview and assessment of all matters with radiological safety implications relative to activities at the SNEC facility. The Committee will review proposed License and Technical Specification changes, DECOMMISSIONING ACTIVITIES, special nuclear and radioactive material activities, facility changes, radiological conditions, audit reports and NRC Inspection reports and corrective actions for deficiencies identified.

3.6.1.3.3 Facility inspections shall meet specific requirements of section 3.5.3 of these TS.

3.6.1.4 These procedures and any subsequent revisions shall be prepared, reviewed and approved in accordance with the requirements of the applicable administrative procedure requirements prior to their initial use.

3.6.2 Programs

The following programs shall be established, implemented, and maintained during DECOMMISSIONING ACTIVITIES:

3.6.2.1 Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR, Section 50.36(a) for the control of radioactive effluents and for maintaining the doses to MEMBER(S) 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:

3.6.2.1.1 Limitations on the OPERABILITY of radioactive effluent monitoring instrumentation, including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

3.6.2.1.2 Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 times the concentrations specified in 10 CFR 20, Parts 20.1001 - 20.2402, Appendix B, Table 2, Column 2;

3.6.2.1.3 Monitoring, sampling, and analysis of radioactive effluents in accordance with 10 CFR, Part 20.1302 and with the methodology and parameters in the ODCM;

3.6.2.1.4 Limitations on the annual and quarterly doses or dose commitment to a MEMBER(S) OF THE PUBLIC from radioactive materials in liquid effluents released to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR, Part 50;

FIGURE 1  
SAXTON NUCLEAR EXPERIMENTAL CORP. FACILITY LAYOUT

Figure deleted

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