



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
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May 30, 2002

Re: Indian Point Unit 2
Docket No. 50-247
NL-02-071

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555-0001

SUBJECT: License Amendment Request (LAR-02-009) – Regarding Changes To Facility Operating License No. DPR-26 To Reflect ENN/IPEC Reorganizations

Pursuant to 10CFR50.90, Entergy Nuclear Operations, Inc. (ENO) hereby requests the following amendment to the Indian Point Nuclear Generating Unit No. 2 (IP2) Facility Operating License No. DPR 26. The integration of the three units of the Indian Point Energy Center (IPEC) under one operating organization, ENO, and the coincidental integration of IPEC into the Entergy Nuclear Northeast (ENN) corporate organization has resulted in the need to revise several administrative programs described or referenced in Appendix A of the Facility Operating License. These changes will simplify any future program changes or reorganizations while maintaining the required regulatory oversight. The changes will also facilitate the conversion of the IP2 Technical Specifications (TS) to the Improved Standard Technical Specifications (ITS). Due to the reorganizations, certain functions are now common to the entire IPEC site and other functions are common to the entire ENN fleet.

Attachment 1 to this letter provides the description and evaluation of the proposed changes for the IP2 TS. The revised TS pages for IP2 are provided in Attachment 2 (strikeout/shaded format).

The onsite safety review committee and the corporate offsite safety review committee have reviewed the proposed changes and concurred that the proposed changes involve no significant hazards consideration as defined by 10CFR50.92(c).

ENO requests that the proposed changes be approved by September 30, 2002 with an effective date for implementation within 60 days of approval.

In accordance with 10CFR50.91, a copy of this submittal and the associated attachments are being submitted to the designated New York State official.

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There are no commitments contained in this submittal.

Should you or your staff have any questions regarding this submittal, please contact Mr. John F. McCann, Manager, Nuclear Safety and Licensing at (914) 734-5074.

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

Sincerely,

Executed on 5/30/02



Fred Dacimo
Vice President – Operations
Indian Point Energy Center
Unit 2

cc: See page 3

Attachments

cc:

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ATTACHMENT 1 TO NL-02-071

LICENSE AMENDMENT REQUEST

**REGARDING CHANGES TO FACILITY OPERATING LICENSE No. DPR-26
TO REFLECT ENN/IPEC REORGANIZATIONS**

**ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
DOCKET NO. 50-247**

LICENSE AMENDMENT REQUEST

INTRODUCTION

Entergy Nuclear Operations, Inc. (ENO) is requesting changes to the Indian Point Nuclear Generating Unit No. 2 (IP2) Facility Operating License No. DPR-26 and Technical Specifications (TS). The proposed changes reflect the integration of the three units of the Indian Point Energy Center (IPEC) under one operating organization, ENO, and the coincidental integration of IPEC into the Entergy Nuclear Northeast (ENN) corporate organization. The proposed changes will also facilitate the IP2 transition to the ITS.

DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGES

Change to IP2 TS Section 6.1.2, "Responsibility"

Description of Change

Removed the capitalization of the title Plant Manager.

Evaluation of Change

The replacement of a specific title for an organizational position with a generic title does not alter the authority or responsibility assigned to the position. Therefore, removing the capitalization from the title does not reduce continued compliance with any regulatory requirements.

Change to IP2 TS Section 6.2.1, "Facility Management and Technical Support"

Description of Change

Replaced the document title Quality Assurance Program Description (QAPD) with "quality assurance program described or referenced in the Updated FSAR" and removed the capitalization of the title Plant Manager.

Evaluation of Change

10 CFR 50.34(b)(6)(ii) establishes the requirement that a description of how the managerial and administrative control requirements set forth in Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants," are satisfied be included in the Final Safety Analysis Report (FSAR). 10CFR50.54 establishes the license condition that each licensee, subject to the quality assurance criteria of Appendix B, shall implement the quality assurance program described or referenced in the FSAR including changes to that report (Updated FSAR). The regulatory controls for changes to the quality assurance program are specified in 10 CFR 50.54(b)(3) and (4) and do not require license amendments. The changes will simplify the administration of IP2 for both ENO and the NRC. The effectiveness of the ENO organization to ensure compliance with the IP2 license is not affected.

Change to IP2 TS Section 6.2.2, “Facility Staff”

Description of Change

Removed the capitalization of the titles Operations Manager and Assistant Operations Manager.

Evaluation of Change

The replacement of a specific title for an organizational position with a generic title does not alter the authority or responsibility assigned to the position. Therefore, removing the capitalization from the title does not reduce continued compliance with any regulatory requirements.

Change to IP2 TS Section 6.3, “Facility Staff Qualifications”

Description of Change

Removed the capitalization of the titles Plant Manager, Operations Manager, Assistant Operations Manager, and Radiation Protection Manager.

Evaluation of Change

The replacement of a specific title for an organizational position with a generic title does not alter the authority or responsibility assigned to the position. Therefore, removing the capitalization from the title does not reduce continued compliance with any regulatory requirements.

Change to IP2 TS Section 6.5.1, “Review and Audit”

Description of Change

Deleted the section, including the statement that the review and audit functions of the Station Nuclear Safety committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC) are described in the Quality Assurance Program Description (QAPD).

Evaluation of Change

The implementation of and any changes to the quality assurance program described or referenced in the Updated FSAR is a license condition controlled by 10CFR 50.54 and does not require redundant description in the TS. The deletion of redundant controls will simplify the administration of IP2 for both ENO and the NRC. The effectiveness of the ENO organization to ensure compliance with the IP2 license is not affected. This is consistent with the guidance in NUREG-1431, “Standard Technical Specifications Westinghouse Plants.”

Changes to IP2 TS Section 6.6, “Reportable Event Action”

Description of Change

Renumbered Section 6.6.1 to include subsection 6.6.1.a and deleted subsection 6.6.1.b, which requires each Licensee Event Report submitted to the Commission to be submitted to the NFSC Chairman and the Vice President-Nuclear Power and be reviewed by the SNSC.

Evaluation of Change

The duties and responsibilities of the onsite and offsite review committees and corporate officers are functions of the quality assurance program as implemented by each licensee. The implementation of and any changes to the quality assurance program described or referenced in the Updated FSAR is a license condition controlled by 10CFR 50.54 and does not require a redundant description in the TS. The deletion of redundant controls will simplify the administration of IP2 for both ENO and the NRC. The effectiveness of the ENO organization to ensure compliance with the IP2 license is not affected.

Changes to IP2 TS Section 6.7, “Safety Limit Violation”

Description of Change

Deleted references to the Vice President-Nuclear Power, the onsite review committee (SNSC) and the offsite review committee (NFSC) from each subsection it occurs.

Evaluation of Change

The duties and responsibilities of the onsite and offsite review committees and corporate officers are functions of the quality assurance program as implemented by each licensee. The implementation of and any changes to the quality assurance program described or referenced in the Updated FSAR is a license condition controlled by 10CFR 50.54 and does not require redundant description in the TS. The deletion of redundant controls will simplify the administration of IP2 for both ENO and the NRC. The effectiveness of the ENO organization to ensure compliance with the IP2 license is not affected.

Changes to IP2 TS Section 6.8, “Procedures and Programs”

Description of Change

Replaced the title “Quality Assurance Program Description (QAPD)” with “quality assurance program described or referenced in the Updated FSAR” and reworded sentences as required to reflect contents of quality assurance program.

Evaluation of Change

The implementation of and any changes to the quality assurance program described or referenced in the Updated FSAR is a license condition controlled by 10CFR 50.54 and does not require redundant description in the TS. The deletion of redundant controls will simplify the administration of IP2 for both ENO and the NRC. The effectiveness of the ENO organization to ensure compliance with the IP2 license is not affected.

Changes to IP2 TS Section 6.10, “Record Retention”

Description of Change

Replaced “Quality Assurance Program Description (QAPD)” with “quality assurance program described or referenced in the Updated FSAR.”

Evaluation of Change

The implementation of and any changes to the quality assurance program described or referenced in the Updated FSAR is a license condition controlled by 10CFR 50.54 and does not require redundant description in the TS. The deletion of redundant controls will simplify the administration of IP2 for both ENO and the NRC. The effectiveness of the ENO organization to ensure compliance with the IP2 license is not affected.

Changes to IP2 TS Section 6.14, “Process Control Program,” Section 6.15, Offsite Dose Calculation Manual,” and IP2 TS Section 6.16, “Major Changes To Radioactive Liquid, Gaseous And Solid Waste Systems”

Description of Change

Deleted “by the SNSC” from the statements regarding review or acceptance of changes to the subjects of the sections.

Evaluation of Change

As discussed in the evaluation of the proposed changes to Section 6.5.1, the review and audit functions of the onsite safety review committee (currently designated as SNSC) are controlled by the quality assurance program as described or referenced in the Updated FSAR. The content, implementation, and change control of this program are specified in 10 CFR 50.54. The removal of specific review or audit functions for the onsite safety review committee from the IP2 TS will simplify the regulation of the 10 CFR 50 Appendix B criteria without reducing the required regulatory controls.

NO SIGNIFICANT HAZARDS CONSIDERATION

The proposed changes described above involve no significant hazards consideration. This conclusion is based on the evaluation, in accordance with 10 CFR 50.91(a)(1), of the three standards set forth in 10 CFR 50.92(c).

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

The proposed change eliminates the redundant controls on elements of the managerial and administrative controls implemented by the quality assurance program described or referenced in the UFSAR. There are no changes proposed to the design, operation, maintenance or testing of the plant's systems, structures or components. Therefore, the assumptions of the operability or performance of systems, structures, or components in accident analyses are unchanged.

The adequacy of the managerial and administrative controls used to assure safe operation were previously accepted by the NRC in their approval of the quality assurance program description. The changes to the existing controls were evaluated under 10 CFR 50.54 to ensure the changes would not reduce the commitments in the quality assurance program description previously accepted by the NRC. Therefore, there is no increase in the probability or in the consequences of an accident previously evaluated.

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

The proposed changes do not affect the design, operation, maintenance, or testing of a plant system, structure or component. No new or unanalyzed conditions can be created through the proposed replacement of specific administrative position titles with generic position titles, since the authority, responsibility and qualification for each required position are specified in the quality assurance program described or referenced in the UFSAR.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed changes do not affect a design function or operation of any plant structure, system, or component. The change does not affect the method of ENO's compliance with any regulation. The changes to the quality assurance program as described or referenced in the UFSAR were evaluated under 10 CFR 50.54 and it was determined that the changes do not reduce any commitments from the quality assurance program description that was previously evaluated and accepted by the NRC.

Therefore, the proposed changes do not result in a change to any of the safety analyses or any margin of safety.

CONCLUSION

The proposed changes do not involve physical changes to the plant, changes to the operation of plant systems, or changes to the plant safety analyses. Accordingly, these proposed requirements involve no significant hazards consideration. The onsite safety review committee and the offsite safety review committee have reviewed the proposed changes and both committees concur that the proposed changes involve no significant hazards consideration as defined by 10CFR50.92(c).

ENVIRONMENTAL ASSESSMENT

An environmental assessment is not required because the proposed changes to the Indian Point Energy Center Unit 2 Facility Operating License No. DPR-26 conform to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(9). The proposed changes will have no impact on the environment. The proposed changes involve no significant hazards consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

ATTACHMENT 2 TO NL-02-071

IP2 LICENSE AMENDMENT REQUEST

TECHNICAL SPECIFICATION PAGES

IN STRIKEOUT/SHADED FORMAT

Deleted text is shown as ~~strikeout~~.

Added text is shown as shaded.

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Vice President-Nuclear Power shall be responsible for overall facility activities and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Pplant Mmanager shall be responsible for facility operations and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Qquality Aassurance Pprogram Ddescribed or referenced ption (QAPD) in the Updated FSAR.
- b. The Pplant Mmanager shall be responsible for overall unit safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President-Nuclear Power shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 Facility Staff

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
- e. All core alterations after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling. This individual shall have no other concurrent responsibilities during this operation.
- f. DELETED
- g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

The amount of overtime worked by unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

- h. The Operations Manager or Assistant Operations Manager shall hold a senior reactor operator license.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the ~~O~~peration Mmanager's and the Aassistant ~~O~~peration Mmanager's SRO license requirement which shall be in accordance with Technical Specification 6.2.2.h, and, (2) the Rradiation Pprotection Mmanager who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975.

6.3.2 The Pplant Mmanager shall meet or exceed the minimum qualifications specified for Plant Manager in ANSI N18.1-1971.

6.3.3 The Watch Engineer shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55.

6.4.2 DELETED

6.5 ~~REVIEW AND AUDIT~~DELETED

~~6.5.1 The review and audit functions of the Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC) are described in the Quality Assurance Program Description (QAPD).~~

6.6 REPORTABLE EVENT ACTION

6.6.0 A Reportable Event is defined as any of the conditions specified in 10 CFR 50.73a(2).

~~6.6.1 The following actions shall be taken:~~ In the event of a Reportable Event, a report shall be submitted to the Commission pursuant to the requirements of 10 CFR 50.73.:

- ~~a. A report shall be submitted to the Commission pursuant to the requirements of 10 CFR 50.73.~~
- ~~b. Each Licensee Event Report submitted to the Commission shall be submitted to the NFSC Chairman and the Vice President Nuclear Power and be reviewed by the SNSC.~~

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit Violation Report shall be reported to the Commission, the Vice President Nuclear Power and to the NFSC Chairman immediately.
- c. The Safety Limit Violation Report shall be prepared. ~~The report shall be reviewed by the SNSC.~~ This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NFSC Chairman and the Vice President Nuclear Power within 10 days of the violation.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained covering the activities referenced below:

- a. The requirements and recommendations of Sections 5.2 and 5.3 of ANSI N18.7-1976 and Appendix A of Regulatory Guide 1.33, Revision 2 except as provided in the Quality Assurance Program ~~Described or referenced in the Updated FSAR~~ ~~tion (QAPD).~~
- b. Process Control Program implementation.
- c. Offsite Dose Calculation Manual implementation.

- d. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Revision 1, April 1974 and Regulatory Guide 4.1, Revision 1, April 1975.
- e. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and any changes to them shall be reviewed and approved for implementation in accordance with the Quality Assurance Program described or referenced in the Updated FSAR (QAPD).

6.8.3 The Quality Assurance Program described or referenced in the Updated FSAR (QAPD) shall address describe the mechanism for making temporary changes.

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

- a. A program which will ensure the capability to obtain and analyze samples of radioactive iodines and particulates in plant gaseous effluents under accident conditions. The program shall include the following:
 - (i) training of personnel,
 - (ii) procedures for sampling and analysis, and
 - (iii) provisions for maintenance of sampling and analysis equipment.

6.9 REPORTING REQUIREMENTS

Routine Reports and Reportable Occurrences

6.9.1. In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator, Region I unless otherwise noted.

6.9.1.11 The COLR, including any mid-cycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

Special Reports

6.9.2 Special reports shall be submitted to the NRC Regional Administrator of the Region I Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. DELETED
- b. DELETED
- c. Sealed source leakage in excess of limits (Specification 4.15).
- d. The complete results of the steam generator tube inservice inspection (Specification 4.13.C.).
- e. Radioactive effluents (Specification 3.9).
- f. Radiological environmental monitoring (Specification 4.11).
- g. Meteorological monitoring instrumentation (Specification 3.15).
- h. Inoperable radiation and hydrogen monitoring instrumentation (Specification 3.5) outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.
- i. Operation of overpressure protection system (Specification 3.1.A.4).

6.10 RECORD RETENTION

6.10.1 The types of plant records required to be maintained are ~~delineated~~ addressed in the Quality Assurance Program ~~Described~~ or referenced in the Updated FSAR ~~ption~~ (QAPD).

6.10.2 The minimum retention periods for plant records are ~~defined~~ addressed in the Quality Assurance Program ~~Described~~ or referenced in the Updated FSAR ~~ption~~ (QAPD).

6.14 PROCESS CONTROL PROGRAM (PCP)

6.14.1 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the Annual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information,
 - b. a determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes, and
 - c. documentation of the fact that the change has been reviewed and found acceptable by the SNSC.
2. Shall become effective upon review and acceptance by the SNSC.

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.15.1 The ODCM shall be approved by the Commission prior to implementation.

6.15.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - a. sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluation justifying the change(s),
 - b. a determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations, and
 - c. documentation of the fact the change has been revised and found acceptable by the SNSC.

2. Shall become effective upon review and acceptance ~~by the SNSC.~~

6.16 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE SYSTEMS

6.16.1 Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid) shall be reported to the Commission in the Radioactive Effluent Release Report for the period in which the change was made. The discussion of each change shall contain:

- a. a summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59,
- b. sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information,
- c. a detailed description of the equipment, components and processes involved and the interfaces with other plant systems,
- d. an evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto,
- e. an evaluation of the change, which shows the expected maximum exposures to individuals in the Unrestricted Area and to the general population that differ from those previously estimated in the license application and amendments thereto,
- f. a comparison of the predicted releases of radioactive materials in liquid and gaseous effluents and in solid waste to the actual releases for the period in which the changes are to be made;
- g. an estimate of the exposure to plant operating personnel as a result of the change, and
- h. documentation of the fact that the change was reviewed and found acceptable ~~by the SNSC.~~