

# Maine Yankee

321 OLD FERRY RD. • WISCASSET, ME 04578-4922

October 15, 2002

MN-02-048

RA-02-124

UNITED STATES NUCLEAR REGULATORY COMMISSION

Attention: Document Control Desk

Washington, DC 20555

## References:

1. License No. DPR-36 (Docket No. 50-309)
2. MYAPC Letter MN-00-004 dated January 13, 2000, Maine Yankee License Termination Plan
3. MYAPC Letter MN-01-023 dated June 1, 2001, Revision 1, Maine Yankee's License Termination Plan
4. MYAPC Letter MN-01-032 dated August 13, 2001, Revision 2, Maine Yankee's License Termination Plan
5. NRC Letter dated December 18, 2001, Request for Additional Information (RAI) for Maine Yankee Atomic Power Station License Termination Plan (TAC No. MA8000).
6. NRC Letter dated January 17, 2002, Request for Additional Information (RAI) for Maine Yankee Atomic Power Station License Termination Plan (TAC No. MA8000).
7. MYAPC Letter MN-02-010 dated February 20, 2002, Maine Yankee Response to NRC RAI #16 (dated December 18, 2001) Addressing Site Hydrogeology
8. MYAPC Letter MN-02-011 dated March 13, 2002, Response to NRC Request(s) for Additional Information for Maine Yankee Atomic Power Station License Termination Plan

Subject: **Revision 3, Maine Yankee's License Termination Plan**

In accordance with 10 CFR 50.82(a)(9), Maine Yankee (MY) hereby submits Revision 3 of the License Termination Plan (LTP). The revised LTP continues to demonstrate that the remainder of decommissioning activities: (1) will be performed in accordance with Title 10 Code of Federal Regulations, (2) will not be inimical to the common defense and security or to the health and safety of the public, and (3) will not have a significant effect on the quality of the environment.

Attachment 1<sup>1</sup> provides the revised LTP for NRC review and approval in accordance with 10 CFR 50.82. Representatives of the State of Maine are informed of this request by copy of this letter.

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<sup>1</sup> Per the guidance of NRC Regulatory Issue Summary 2001-05, Maine Yankee is submitting a CD-ROM containing the revised LTP (Attachment 1). The attached CD provides the LTP in the form of twelve (12) files in Adobe Acrobat® "pdf" format (one file for each of the 10 LTP sections, one file for the cover image, and one file for this cover letter). No paper copies of the LTP are being submitted.

Maine Yankee has included a "Preface" section in the LTP entitled "License Termination Plan Requirements - A Non-Technical Summary." This section is provided to the NRC for information only. It is intended to describe technical aspects of license termination in "layman's" terms. This section of the LTP is not intended to support NRC's review of the LTP pursuant to 10 CFR 50.82 and 10 CFR 20 Subpart E.

#### Maine Yankee LTP Revision History

Reference 2 transmitted the initial Maine Yankee LTP for NRC review and approval. Reference 3 transmitted LTP Revision 1 and reflected changes in the approach for decommissioning and revised criteria for completion of decommissioning activities. LTP Revision 1 also incorporated MY responses to comments and questions from the State of Maine, Friends of the Coast, and the NRC. Reference 4 transmitted LTP Revision 2 which incorporated additional changes resulting from on-going stakeholder interface, as well as internal MY LTP review and refinement.

#### Maine Yankee LTP Revision 3 Changes

The NRC Staff's review of LTP Revision 2 resulted in two sets of NRC Requests for Additional Information (RAI), provided to Maine Yankee in December 2001 and January 2002 (References 5 and 6). Maine Yankee's responses to these RAIs were provided primarily in letters dated February 20 and March 13, 2002 (References 7 and 8). Attachment 2 provides a listing of other, principal Maine Yankee correspondence relevant to the NRC review since the submittal of LTP Revision 2.

The bulk of the changes incorporated into the attached LTP Revision 3 are associated with Maine Yankee's responses to the NRC RAIs. Other changes in the revision reflect: (1) the resolution of issues raised by the State of Maine and Friends of the Coast, (2) updates to characterization data and refinement of dose modeling, and (3) progress made in site structure and lands decommissioning. The most notable changes resulted from the resolution of stakeholder issues related to the Maine Yankee - State of Maine Settlement Agreement<sup>2</sup>.

Right hand margin revision bars notate changes in Revision 3. As discussed with the NRC Staff on October 9, 2002<sup>3</sup>, Maine Yankee has maintained an informal listing of changes made to the LTP cross-referenced to the change source (such as a given NRC RAI or Settlement Agreement item). Because these listings may be helpful to the NRC Staff in conducting its review of the attached LTP Revision 3, they are included with this transmittal as Attachment 3. It should be noted that these listings were developed exclusively as a tool and, as such, are considered to be generally complete.

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<sup>2</sup> Filing before the NRC Atomic Safety and Licensing Board, dated August 31, 2001, Notice of Settlement and Joint Motion to Terminate the Proceeding (ASLBP No. 00-780-03-OLA)

<sup>3</sup> Maine Yankee and the NRC have held routine conference calls since the commencement of active review of LTP Revision 2. These calls included the participation of the State of Maine and Friends of the Coast.

10 CFR 50.90 Application to Amend the License

LTP Revision 2 (Reference 4) submitted Supplement 2 to the application to amend the license (pursuant to 10 CFR 50.90) to add a license condition, which requires Maine Yankee to implement and maintain in effect all provisions of the License Termination Plan. None of the changes in Revision 3 of the Maine Yankee LTP impact the Proposed License Change submitted in Reference 4; therefore Supplement 2 remains valid. Note that the LTP of record is now this revision (Revision 3) dated October 15, 2002 and that the license condition should be re-numbered to 2.B(10) due to the issuance of License Amendment No. 167<sup>4</sup>.

If you have any questions, please contact us.

Sincerely,



Thomas L. Williamson, Director  
Nuclear Safety and Regulatory Affairs

Attachments

1. License Termination Plan, Revision 3 (CD-ROM)
2. Maine Yankee to NRC Correspondence Supporting the LTP Review
3. Summary Listing of LTP Revision 3 Changes - by Section

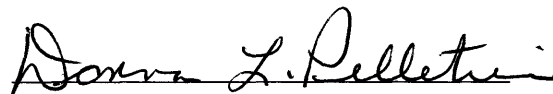
cc: Mr. B. Barnes, Deputy Commissioner, MDEP  
Dr. R. R. Bellamy, NRC Region I  
Mr. E. L. Blake, Jr., Shaw Pittman  
Ms. P. Craighead, Esq., State of Maine, Nuclear Safety Advisor  
Mr. P. J. Dostie, State of Maine, Division of Health Engineering  
Mr. R. A. Gramm, NRC Section Chief, Project Directorate IV & Decommissioning  
Mr. J. T. Greeves, NRC Director, Division of Waste Management  
Dr. P. W. Haines, State of Maine, Deputy Director, Bureau of Health, MDHS  
Ms. J. Jones, State of Maine, Department of Environmental Protection  
Ms. E. Mason, Esq., USEPA New England, Office of Regional Counsel  
Mr. H. J. Miller, NRC Regional Administrator, Region I  
Mr. C.L. Pittiglio, NRC NMSS Project Manager, Decommissioning  
Mr. R. Ragland, NRC Region I  
Mr. R. Shadis, Friends of the Coast  
Mr. M. K. Webb, NRR Project Manager

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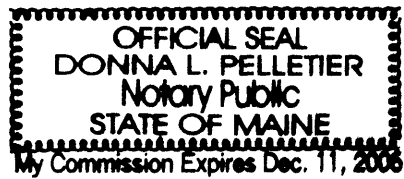
<sup>4</sup> NRC Letter dated July 30, 2002, Issuance of Amendment No. 167 (Partial Release of Site Lands from the Facility License)

STATE OF MAINE

Then personally appeared before me, Thomas L. Williamson, who being duly sworn did state that he is the Director, Nuclear Safety and Regulatory Affairs of Maine Yankee Atomic Power Company, that he is duly authorized to execute and file the foregoing request in the name and on the behalf of Maine Yankee Atomic Power Company, and that the statements therein are true to the best of his knowledge and belief.



Notary Public



# **Attachment 1**

**MAINE YANKEE LICENSE TERMINATION PLAN  
REVISION 3  
(enclosed CD-ROM)**

**Attachment 2**  
**Maine Yankee to NRC Correspondence Supporting the LTP Review<sup>5</sup>**

<b>Letter No</b>	<b>Date</b>	<b>Topic</b>
MN-01-034	August 16, 2001	Early Release of Backlands (Combined)
MN-01-038	October 1, 2001	Submittal of Initial Characterization Survey Report and Historical Site Assessment
MN-01-039	October 4, 2001	Maine Yankee LTP Related Calculations
MN-01-041	October 16, 2001	Maine Yankee LTP Related Hydro-Geological Reports
MN-01-040	October 17, 2001	Request for Expedited NRC Finding on the Status of the Intertidal Zone
MN-01-044	November 19, 2001	Early Release of Backlands-Combined (Supplement to MN-01-034; addressed NRC Staff comments on the MY August 16, 2001 submittal)
MN-02-002	January 16, 2002	Transmittal of Special Report: "Transuranic and Other Hard to Detect Radionuclides in Maine Yankee Sample Media"
MN-02-009	February 14, 2002	Maine Yankee LTP Related Support Document - Resource Conservation Recovery Act (RCRA) Quality Assurance Project Plan (QAPP)
MN-02-010	February 20, 2002	Maine Yankee Response to NRC RAI #16 (dated December 18, 2001) Addressing Site Hydrogeology
MN-02-011	March 13, 2002	Response to NRC Request(s) for Additional Information for Maine Yankee Atomic Power Station License Termination Plan
MN-02-012	March 13, 2002	Maine Yankee LTP Related Support Document – Comprehensive Natural Resource Protection Act (NRPA) Application
MN-02-015	April 11, 2002	Revised Maine Yankee Response to NRC RAI #5 (dated December 18, 2001) - Supplementary Historical Site Assessment (HSA) Data
MN-02-017	April 23, 2002	Package 1 of RAI Related LTP Changes
MN-02-030	June 26, 2002	Submittal of CWPH NRPA Application and Other Related NRPA Review Documentation
MN-02-037	August 28, 2002	Maine Yankee Addendum Report Regarding Site Hydrogeology
MN-02-119	October 3, 2002	Minor Corrections to Maine Yankee Responses to NRC Requests for Additional Information

<sup>5</sup> This table provides a listing of key Maine Yankee to NRC correspondence supporting the NRC's review of LTP Revision 2, i.e., letters filed after the submittal of LTP Revision 2.

### Attachment 3

#### Summary Listing of LTP Revision 3 Changes - by Section

#### Preface - Revision 3 Changes

Section	Change / Topic	Source	Date
P.2	Revised DCGL from 17,000 to 18,000	MYAPC	100702

#### Section 1 - Revision 3 Changes

Section	Change / Topic	Source	Date
1.1, 1.2	Decommissioning updates	MYAPC	100702
1.2	SA / TIRP / RAI - Added updated discussion	MYAPC	042402
1.4.1	Revised to clearly reference the relevant license condition	RAI1-1	042302
1.4.1	Revised to include an explanation of each of the change criteria in the license condition	RAI1-23	042302
1.4.1	Revised to incorporate commitment (increase in a DCGL).	RAI1-23-1 SA / A4-2, 3, 4	042302
1.4.1	Added commitment to provide prior notification to NRC re: survey unit classification downgrade.	RAI1-23	072402
1.4.1	Clarified sentence re: MY's effort to "over perform"	MYAPC	072602
1.4.1	Added additional clarification on less than 10 mrem release criteria / ref to Table 6-11  Revised 1.4.1 to be consistent with 5.6.4 regarding area classification downgrade to Class 2 or 3. Reference to 5.6.4 added  Updated to reflect MY agreement to provide NRC prior notice (at least 2 weeks) re: intent to downgrade SU classification.	NRC Letter 8/23/02  RAI2-13b	091602 092102 092602 092702
1.4.1	Corrected license condition from 2.B(9) to (10)	MYAPC	100702
1.4.2 1.7	NRC letter to Maine Yankee, dated July 30, 2002, Issuance of Amendment No. 167, license amendment approving partial release of site lands. (Reference added to 1.7)	NRC Ltr 7/30/02	091602
1.4.2.c	Updated to reflect the consolidated partial site release application dated August 16, 2001 and the acreage will be corrected	RAI1-2	042302
1.5.2, 1.7	Revised titles used for GTS report to be consistent; corrected ref 1.7 (same as in Section 2 and 5)	RAI1-3/4	081902
1.7	Add references to PSDAR, DSAR, LD2688-SP1084	MYAPC	090602 072602
Attach 1A	Removed "Draft" from footer, numbered pages as a separate attachment	MYAPC	092502 042402

Source Key: **RAI1** = 12/18/2001 NRC RAIs; **RAI2** = 01/17/2002 NRC RAIs; **SA** = 08/30/2001 ASLB Settlement Agreement Item; **EPA** = 05/10/2002 EPA comment; **TIRP** = Technical Issue Resolution Process (part of the Settlement Agreement (SA)); **FOTC** = 03/30/2001 and 04/10/2001 Friends of the Coast Comments

### Attachment 3

#### Summary Listing of LTP Revision 3 Changes - by Section

#### Section 2 - Revision 3 Changes

Section	Change / Topic	Source	Date
Various subsections	Updated various references to attachments (adding "2" to Rev 0 attachment titles)	<b>NRC comment 10/8/02</b>	100902
2.1, 2.2.5, 2.2.6, 2.3, 2.3.2a, 2.3.4b, Table 2-2, 2.3.5, 2.3.5a/b, 2.4.4, 2.4.7, 2.5, 2.5.2a,	Various clarification updates re: ICS/CCS nomenclature in text.	<b>RAI1-3, 4</b>	081902
2.1 thru 2.7	(Same as above entry)	<b>RAI1-4</b>	053102
2.2.1	Added CSB spill events to HSA "key" items listing; updated total HSA items	<b>RAI1-5</b>	042302
2.2.5	Updated refueling cavity water processing	<b>MYAPC</b>	053102
2.2.5	Updated to reflect Backlands license amendment	<b>MYAPC</b>	082902
2.2.5	Updated to reflect the August 13, 2001 and November 19, 2001 partial site release applications. The references to Attachment A will be deleted; Attachment 2A updated.	<b>RAI1-7</b>	042302
2.2.5	Updated to reflect fuel transfer to ISFSI	<b>MYAPC</b>	100602
2.3.4.d	Clarified the exposure rate of soil for 5 pCi/g	<b>RAI1-8</b>	042302
2.3.7 2.4.7.b	Added footnotes to clarify survey packages numbering system (i.e., ICS to later CCS)	<b>MYAPC</b>	100902
2.4.7	Updated embedded piping footage	<b>MYAPC</b>	092102 091002 090302
2.4.8	Clarified core population samples	<b>RAI1-9</b>	080602
2.5.2.b	Corrected MDAs of 0.01 pCi/g to 1.0 pCi/g	<b>RAI1-11b</b>	082802
2.5.2.b & 2.5.3.c	Added ref to new Attachment 2I	<b>RAI1-11a &amp; 15a</b>	090302
2.5.2.d	Clarified buried pipe contribution (relationship) to annual dose (i.e., much less)	<b>RAI1-12</b>	042302
2.5.2.f (g)	Corrected typo - should be 2.5.2f	<b>MYAPC</b>	090902
2.5.2.g, 2.5.3.e, Attach 2H	Forebay characterization discussion. Added NEW Attachment 2H	<b>RAI1-17.1</b>	091602 071202
2.5.3.a Table 2-7,8 (titles)	Revised wording to provide ref. to Att 2F for core variability for BOP and Special Areas Expand discussion of O/A trench to include all "special areas"	<b>RAI1-14.4</b>	092402 052202

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**Attachment 3**  
**Summary Listing of LTP Revision 3 Changes - by Section**

<b>Section</b>	<b>Change / Topic</b>	<b>Source</b>	<b>Date</b>
2.5.3.b	Added:...an evaluation will be performed to determine if changes to the nuclide fraction are warranted.	<b>RAI1-14-1</b>	042302
2.5.3.c	Added footnote to 2.5.3c reflecting wording from RAI1-15a response about HPCI/LPCI lines.	<b>RAI1-15a</b>	092002
2.5.3.d 2.5.2.f 2.7 Table 2C-3	Revised discussion on site hydrogeology, primarily reference to latest reports to NRC of 2/20/02 and 8/28/02 on groundwater.  2.5.3f revised to reference 2.5.3d. Also revised to reference Table 2C-3. And revised to explain why fire pond data is not in Table 2C-3  MY submittals to NRC (RAI1-16 response and Stratex reports) added to References in 2.7  Table 2C-3 revised; added note regarding Attachment 2H.	<b>RAI1- 16</b>	092002
2.5.3.f	Added new section title; “Future Sampling”	<b>RAI1-13.e</b> <b>RAI1-15</b> <b>RAI1-17</b>	042302
2.5.3.f	Editorial changes to “Future Sampling” section; providing updated references to tables in text.	<b>MYAPC</b>	052102
2.7.11	Updated NRC ref	<b>RAI2-16</b>	082602
2.7.16	Added reference to TIRP’s TRU-HTD report	<b>RAI1-14.3</b>	082802
2.7.18	Added EC-041-01 to references	<b>RAI1-17.1</b>	091502
2.7.23	Added reference to supplemental HSA information	<b>RAI1-5</b> <b>NRC comment</b> <b>10/08/02</b>	100902
Attach 2A	Revised to be consistent with the consolidated partial site release application package	<b>RAI1-7</b> <b>RAI1-18</b>	042302
Attach 2F	Revised to be consistent with Calculation EC 011 and per TIRP/LTP Team comments	<b>Numerous RAIs</b> <b>TIRP</b>	073102
Attach 2G	Added new Attachment 2G to describe processing (and other details) re: concrete cores	<b>RAI1-14.3</b>	080502
Attach 2H	New Attachment 2H added to provide detail on forebay/diffuser characterization.  Updated status of forebay dike boring effort; indicated schedule for providing NRC results	<b>RAI1-17.1</b> <b>FOTC comment</b>	100902
Attach 2I	Added new Attachment 2I	<b>RAI1-11a &amp; 15a</b>	090302
Attachments	All attachments created as separate files	<b>MYAPC</b>	092002

**Source Key:** **RAI1** = 12/18/2001 NRC RAIs; **RAI2** = 01/17/2002 NRC RAIs; **SA** = 08/30/2001 ASLB Settlement Agreement Item; **EPA** = 05/10/2002 EPA comment; **TIRP** = Technical Issue Resolution Process (part of the Settlement Agreement (SA)); **FOTC** = 03/30/2001 and 04/10/2001 Friends of the Coast Comments

**Attachment 3**  
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<b>Section</b>	<b>Change / Topic</b>	<b>Source</b>	<b>Date</b>
Table 2-10	1.5 to 3.5 depth, Variance of act concrete ACTIVITY with depth / added ***note per JCD and corrected 0-0.5" sample activity.  Corrected entry (i.e., label on slice) to "1.5 to 4.0"	<b>RAI1-14.2</b>	042302 100902
Table 2-12 Table 2-13	Corrected title: fractions vs concentrations	<b>RAI1-17</b>	042302
Table 2-5	Added a row to segregate the exposure rate for the woodland and scrub areas	<b>RAI1-10</b>	042302
Table 2-6	H-3 should be 400 (max)	<b>RAI1-10</b>	042302
Table 2-8	Updated Special Area nuclide fractions	<b>RAI1-14-4</b>	092402
Table 2A-3	1997 GTS: Eaton Farm = 0.45 vs 0.46, Merrymeeting = 0.42 vs 0.35	<b>MYAPC</b>	053002
Table 2A-7	Corrected Eaton Farm / Merrymeeting	<b>MYAPC</b>	053002
Table 2A-8 & 9	Added new tables	<b>MYAPC</b>	053002
Table 2B-5	Revised Cs-137 numbers / Added footnote: * Includes twelve marine sediment samples taken the New Meadows River and the Damariscotta River.	<b>MYAPC</b>	053002
Table 2B-6	Added discrete particle footnote	<b>RAI1-11c</b>	082802
Table 2B-8	Revised to show the MDA values for each of the above sample locations. (743, 3126 and 2255 respectively, Ave: 2024 pCi/L).	<b>RAI1-10</b>	042302
Table 2C-2	Added note to title, i.e., geometry corrected except as noted (1) Corrected samples 3-3A, 10-3A, 12-4a, and 13-2A data	<b>MYAPC</b>	100602
Table 2C-2	Sample 10-3A: added a decimal point (21.5) Added footnote on geometry correction	<b>RAI1-14-3</b>	053002
Table 2C-2	Added note (2) on net count rate	<b>RAI1-14.3</b>	090302
Table 2C-3	Corrected Sb-125 = 0.4	<b>RAI1-17</b>	042302

**Section 3 - Revision 3 Changes**

<b>Section</b>	<b>Change / Topic</b>	<b>Source</b>	<b>Date</b>
3.0 etc	General updates to sections to reflect current state of decommissioning	<b>MYAPC</b>	100702
3.1.2	Updated to include a description of the August 16th and November 19th application supplements.	<b>RAI1-19</b>	042302
3.1.2	Updated to reflect completed construction of ISFSI and commencement of fuel movement	<b>MYAPC</b>	091902
3.1.2 3.7.7	Updated: NRC approval of backlands license amendment. Added reference to NRC letter in Sect. 3.7	<b>MYAPC</b>	091902

**Source Key:** **RAI1** = 12/18/2001 NRC RAIs; **RAI2** = 01/17/2002 NRC RAIs; **SA** = 08/30/2001 ASLB Settlement Agreement Item; **EPA** = 05/10/2002 EPA comment; **TIRP** = Technical Issue Resolution Process (part of the Settlement Agreement (SA)); **FOTC** = 03/30/2001 and 04/10/2001 Friends of the Coast Comments

**Attachment 3**  
**Summary Listing of LTP Revision 3 Changes - by Section**

Section	Change / Topic	Source	Date
3.1.3	Revised to include the requirement to perform FSS prior to allowing a basement to be backfilled.	<b>RAI1-20</b>	042302
3.1.3	Revised / Added ref to NRC Circular 81-07	<b>SA / A3-1</b>	091002
3.7.7	Deleted reference to Cumulative Risk letter	<b>MYAPC</b>	042402

**Section 4 - Revision 3 Changes**

Section	Change / Topic	Source	Date
Attach 4A	Created separate file to allow consistency in format / page numbering	<b>MYAPC</b>	092202
Attach 4B	Created separate file to allow consistency in format / page numbering	<b>MYAPC</b>	092202

**Section 5 - Revision 3 Changes**

Section	Change / Topic	Source	Date
5.1.3	Updated to reflect NRC license amendment on backlands	<b>MYAPC</b>	092902
5.1.4	Reference to 1.4.2.c - made consistent with the current partial site release application package	<b>RAI2-2</b>	042302
5.1.4, 5.12	Updated NRC / EPA references	<b>RAI2-16</b>	082602
5.10.1 Figure 5-6	Updated Organization - Corrected title of ISPRE - Radiochemist role per 5.14 of PMP 6.0	<b>RAI2-15</b>	092202 080102
5.11.3	Changed work order process to administrative controls	<b>MYAPC (QA)</b>	071602
5.2.3	Changed the "may" to "will" to require FSS prior to backfilling excavated foundations. / replaced "RA" with "Industrial Area"	<b>RAI2-3f</b>	042302
5.2.3	Described survey unit design limitations	<b>RAI2-3d</b>	053102
5.2.3	Added RAI response excerpt, rationale for classifying bldg footprint lower than foundation surface.	<b>RAI2-3e</b>	060402
5.2.3	Added reference to Attachment 5A in text	<b>RAI2-3c</b>	060402
5.2.4, 5.4.5.b, Attach 5A	Updated forebay discussion (5.2.4); clarified ICS/CCS.	<b>RAI1-3/4</b>	081902
5.3.1	Added rationale for survey unit size	<b>RAI2-4</b>	042302
5.3.1.a	Clarified: survey unit size for standing buildings is based on scenario pathways	<b>RAI2-4</b>	092102
5.4.2	Corrected typo: Appendix E of NUREG 1727		092402

**Source Key:** **RAI1** = 12/18/2001 NRC RAIs; **RAI2** = 01/17/2002 NRC RAIs; **SA** = 08/30/2001 ASLB Settlement Agreement Item; **EPA** = 05/10/2002 EPA comment; **TIRP** = Technical Issue Resolution Process (part of the Settlement Agreement (SA)); **FOTC** = 03/30/2001 and 04/10/2001 Friends of the Coast Comments

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#### Summary Listing of LTP Revision 3 Changes - by Section

Section	Change / Topic	Source	Date
5.4.2.c 5.2.3	Added RAI excerpt on conservative use of sigma and discussion on evaluation of survey units with two different classifications Added ref to 5.4.2 in 5.2.3	<b>RAI2-3g</b>	091902
5.4.3	Added SA Item B.3	<b>SA / B.3</b>	042402
5.4.3	Added statement re: how significant variations in background reference areas would be addressed.	<b>RAI2-6</b>	060402
5.4.3	Added paragraph on background subtraction	<b>MYAPC</b>	100702
5.4.4	Added recognition of triangular grid method	<b>RAI2-7b</b>	042302
5.4.4	Clarified: if sole use of GPS , a more accurate system will be obtained	<b>RAI2-7a</b>	042302
5.4.4.b	Deleted FSSC	<b>MYAPC</b>	071702
5.4.5 5.4.5.d, f 5.10.5.c	Added QC measures in SU design and FSS implementation. Added <u>portion</u> of RAI excerpt on CR process Added ref to Section 5.4.5(f), added detail on investigation process from RAI response	<b>RAI2-8</b>	060302
5.4.5.b	Clarified data list	<b>MYAPC</b>	042402
5.4.5.f	Changed “floppy disc: to appropriate storage media	<b>MYAPC</b>	100702
5.5.1.a	Expanded discussion on activated concrete	<b>State of Maine (Comment #73)</b>	101002
5.5.1.a	Added paragraph on removable contamination surveys (excerpt from RAI2-12a response)	<b>RAI2-12a</b>	060402
5.5.1.a 5.5.2.d	Corrected land scan speed to = 0.25m/sec deleted para on Land Area Scans	<b>MYAPC</b>	100702
5.5.1.a,d	Added T2-8 reference and add. paragraph on Vol. Conc. Meas.	<b>RAI2-9</b>	060402
5.5.1.b	Clarified last para under Stored Excavated Soil	<b>MYAPC</b>	042402
5.5.1.b	Clarified 2 <sup>nd</sup> para under Volumetric Samples	<b>MYAPC</b>	042402
5.5.1.b	Added RAI response excerpt, additional detail of actions taken to survey and handle stored soil for future re-use on site.	<b>RAI2-11</b>	060302
5.5.1.d	Updated forebay discussion	<b>MYAPC</b>	053002
5.5.1.d	Changed Section title to “specific” from “special” - to avoid confusion with Section 2 “Special Areas”	<b>MYAPC</b>	092502
5.5.2.d	Added reference to EC-009-01 (Ref 5.12.32)	<b>RAI2-12.c</b>	092502
5.5.2.d	Added ref to Section 6.7.2	<b>RAI2-12.d</b>	042402
5.5.2.d	Reorganized; added discussion on Structure MDC	<b>RAI2-12.e.2</b>	050102

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<b>Section</b>	<b>Change / Topic</b>	<b>Source</b>	<b>Date</b>
5.5.2.d	Expanded detail on land survey technique re: distance to surface, peak trap mode, etc.	<b>RAI2-12.e.3</b>	091002
5.5.2.d Table5-6	Changed soil DCGL from 3.0 to 3.2	<b>MYAPC</b>	091002
5.5.2.e	Added discussion on Co-60 discrete particle capability and confirms E600 operation in SCA mode. Added statement on Cs-137 (at 3 pCi/g)	<b>RAI2-12.e.3</b> <b>RAI2-1.3</b>	050102
5.5.2.f	Added discussion on Es	<b>RAI2-12g</b>	053002
5.5.2.g	Expanded Pipe crawler discussion	<b>RAI2-12h</b>	092502 053002
5.6	Clarified: elevated measurement was the result of a discrete particle or a distributed source	<b>RAI2-3a</b>	042302
5.6.2	E600 closure action. Added more detailed discussion on actions upon receiving confirmed indication of elevated area.. Added reference to 5.6.4 re: more discussion on reclassification.	<b>RAI2-12.f.3</b>	050202
5.6.3	Added note from MARSSIM 8.5.2 (Rev 1 as published in FedReg, 6/01)	<b>MYAPC</b>	081202
5.6.3 5.8.1.d	Added TIRP PS-4 Unity Rule changes, including NEW Section 5.8.1.d  5.8.1d revised to remove exact dose result of 7.52	<b>MYAPC</b> <b>TIRP</b>	091002 081702  093002
5.6.4 5.12	5.6.4: further revised to address downgrade from Class 1 or 2 to Class 3.  Further revisions to 5.6.4 to reference 8/23/02 NRC letter on downgrades and to clearly specify Class 1 to Class 2 downgrade considerations  Expanded discussion on evaluation actions in an investigation	<b>RAI2-13.b</b>	092102 091602 050102
5.8.1.b	Corrected $W_f$ value criteria	<b>MYAPC</b>	042402
5.8.1.b,c	Corrected WRS Test and Sign Test equations to be consistent with MARSSIM	<b>RAI2-14</b>	042302
5.8.1.b,c	Corrected "N" nomenclature, added 40% or fewer "less than" values qualifier.	<b>RAI2-14</b>	042302
5.9.4	Clarifications for consistency with FSS procedures	<b>MYAPC (QA)</b>	071602
Attach 5A	Updated piping data	<b>MYAPC</b>	090402
Table 5-1A	Revised survey area sizes	<b>MYAPC</b>	060502

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**Summary Listing of LTP Revision 3 Changes - by Section**

<b>Section</b>	<b>Change / Topic</b>	<b>Source</b>	<b>Date</b>
Table 5-1A to 5-1C Table 5-1E 5.4.5.i 5.5.1 5.1.2 5.6 5.6.1 5.6.3 5.7.2 5.8.1.c 5.9.1 5.10.2.d,f	Section 5, QA/Licensing Compliance Review changes	<b>MYAPC</b>	082102
Table 5-1B	Inserted N/A for Information Center (B1400) exterior	<b>MYAPC</b>	100702
Table 5-2	Revised by removing the reference to buried piping/conduit. Added footnote will be added to Table 5-2 indicating that the 180 m <sup>2</sup> includes floor and lower walls	<b>RAI2-4</b>	042302
Table 5-3a	Corrected typo for Sr-90	<b>MYAPC</b>	100702
Table 5-4	Added revised detector areas for 43-37 and 43-37-1 instruments; revised column header: "total detector area"	<b>RAI2-12.b</b>	061902
Table 5-4	Added Ludlum window info. Corrected window data in response.	<b>RAI2-12b</b>	042302
Table 5-4a	Correct typo for land area scan MDC for Type 1=0.5 at 16 and 15 m <sup>2</sup> area	<b>MYAPC</b>	061902
Table 5-4a	New title (Land Area Scan MDC) since new Table 5-4b covers Structure Scan MDC  Added reference in table to Section 6.7 (4.2 Ci/g DCGL explanation)	<b>RAI2-12.e.3</b>  <b>RAI2-12.c</b>	050202
Table 5-4b	New table on Structure Scan MDC	<b>RAI2-12.e.2</b>	050102
Table 5-6	Updated liquid beta parameters	<b>MYAPC</b>	042402
Table 5-6	Added TBD scan MDCs / corrected detector nomenclature	<b>RAI2-12f-1</b>	042402
Table 5-7	Added footnote on scan MDC: Must be calculated <i>a priori</i>	<b>MYAPC</b>	091002

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### Attachment 3

#### Summary Listing of LTP Revision 3 Changes - by Section

#### Section 6 - Revision 3 Changes

Section	Change / Topic	Source	Date
6.1 6.5.1 6.5.4 6.6.8 6.7.2 Table 6-1	Removed the word "conduit" associated with buried pipe	MYAPC	092102
6.10.6	Added calculation EC 004-01 ref	RAI1-17.1	082802
6.3	Deleted obsolete NRC ref to Regulatory Guide DG-4006	RAI2-16	082602
6.3	Reworded passage on 'contamination on basement surfaces'	MYAPC	100702
6.6.1.a and d	Added "flowable fill" to discussion	MYAPC	100702
6.6.1.c	Corrected soil depth from 5.8 to 2.8 m	MYAPC	100702
6.6.2	Updated concrete / rebar dose	MYAPC	092102
6.6.2.b	Corrected inventory form 3.43 to 3.30E+08	MYAPC	100702
6.6.3	Updated to reflect Embedded Spray Pump piping	MYAPC	092102
6.6.3 / 6.7.2	Updated embedded piping info		082602
6.6.5.a	Corrected vol. source term = 28500 m <sup>3</sup>	MYAPC	100702
6.6.6	Updated groundwater discussion to reflect commitment for routine sampling of CFS and PAB test pit. Include reference back to 2.5.3d.	RAI1-16	092002
6.6.9	Added new text	RAI1-17.1	082802
6.7	Added explanation of 4.2 pCi/g	RAI1-21.1	053002
6.7	Revised soil DCGL to 3.2	MYAPC	091002
6.7, 6.7.2	Revised OA trench text to "special areas"	MYAPC	082802
6.7.16	Added EC 041-01 to Section 6 references	MYAPC	091502
6.7.2	Added explanation of 4.2 pCi/g (DCGL outside RA)	RAI2-12.c	060502
6.7.2	TIRP PS-4 Unity Rule changes  Revised to replace exact dose value of 7.52 mrem/y for more general language	RAI2-12d TIRP	093002
6.8.3 6.8.4 6.8.5	Added new sections to address AF for buried and embedded piping	RAI1-25a & c	091602
Attach 6-13	Updated DCGLs / dose	MYAPC	092002
Attach 6-17	Updated activated rebar table	MYAPC	092002

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**Summary Listing of LTP Revision 3 Changes - by Section**

<b>Section</b>	<b>Change / Topic</b>	<b>Source</b>	<b>Date</b>
Attach 6-18	Updated / corrected title (special areas)	<b>MYAPC</b>	092002
Attach 6-19	Added: Special Areas Unitized Dose Factors	<b>MYAPC</b>	092002
Attach 6-2, 6-6, 6-8, 6-9, 6-11, 6-12, 6-14, 6-15, 6-16	Updated per latest engineering calculations	<b>EC-041-01</b>	092502
Attach 6-7 new version	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	090302
Table 6-10	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092002
Table 6-11	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092002
Table 6-12	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092302
Table 6-14	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092302
Table 6-3	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092102
Table 6-4	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092002
Table 6-5	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092002
Table 6-6a	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092002
Table 6-6b	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092002
Table 6-8	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092302
Table 6-9	Updated per latest engineering calculations and/or technical basis document	<b>MYAPC</b>	092002

**Section 7 - Revision 3 Changes**

<b>Section</b>	<b>Change / Topic</b>	<b>Source</b>	<b>Date</b>
7.0	Updated per Financial	<b>MYAPC</b>	042302
7.1	Removed ref. To Appendix C	<b>RAI2-18</b>	042302
Table 7-1	Added "TLG Site Specific Cost Estimate" to title	<b>RAI2-17</b>	042302
Table 7-2	Added to title: "and Financial Planning Estimate and updated data"	<b>RAI2-17</b>	042302
Table 7-3	Added new table	<b>RAI2-19</b>	042302
Table 7-3	Added footnote re: FSS cost estimate.	<b>RAI2-19</b>	073002
Table 7-3	Added "Notes" label to bottom of table	<b>MYAPC</b>	091202

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### Attachment 3

#### Summary Listing of LTP Revision 3 Changes - by Section

#### Section 8 - Revision 3 Changes

Section	Change / Topic	Source	Date
8.1.1 8.1.4 8.1.8 8.3	Identified specific document that bounds the env impact per RAI request	<b>RAI1-27</b>	073002
8.1.1	Updated NRC ref for NUREG 1700	<b>RAI2-16</b>	082602
8.2 8.9	Updated: Comprehensive NRPA re: alternative analysis for demolition of forebay and diffuser. Numerous additions to Reference (8.9) as appropriate to support NRPA related changes.	<b>RAI1-32</b>	060602
8.2, 8.4.6 8.6.3 8.6.13 8.8	Various updates/ clarifications from MY RCRA specialist; included clarification of LTP use of unrestricted release under 50.82 vs. use of institutional controls re: to non-rad assessment. Updates, in part, address several related EPA comments as well.	<b>MYAPC EPA comments (various)</b>	081202
8.2 8.6.4	Expanded discussion on forebay remediation / NRPA review process / MDEP conditional approval	<b>State of Maine (MDEP comment 10/8/02)</b>	100902
8.3.2	Clarified the reference to Regulatory Guide 1.185 Section C.6 "Changes to the PSDAR"	<b>RAI1-28</b>	030602
8.3.2	Added discussion: meeting RG 1.185 per RAI (bounded by FGEIS; no PSDAR revision needed)	<b>RAI1-28</b>	073002
8.4.1	Updated to reflect the partial site release application submittal of August 16, 2001, supplemented on November 19, 2001 and will correct the acreage inconsistencies.	<b>RAI1-29</b>	030602
8.4.1	Updated to reflect granting of license amendment.	<b>RAI1-29</b>	072602
8.4.11	Added review by State re: historical and archeological resources	<b>RAI1-30</b>	040302
8.6.13 8.1.2 8.2	Clarification on meaning of radiological "unrestricted use"; clarify potential for institutional controls.	<b>EPA#71</b>	072602
8.6.2	RCRA update, per response to RAI  Revised per 10/9/02 comments from MDEP; clarify conditional aspects of forebay NRPA permit.	<b>RAI1-33</b>  <b>State of Maine (MDEP comment 10/8/02)</b>	072602 100902

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<b>Section</b>	<b>Change / Topic</b>	<b>Source</b>	<b>Date</b>
8.6.4 8.4	-Relocated NRPA info to 8.6.4, added discussion on Circ Water Pump House NRPA -Added reference to Section 8.5 and 8.6 in 8.4 -Revised 8.6.4 to update for CWPH and Comp NRPA app and approvals  8.6.4 Revised per 10/10/02 State comments; clarified conditional aspects of forebay NRPA permit and MDEP approval of Phase II plan.	<b>RAI1-31</b> <b>RAI1-32</b>	040202 053102 080502 100702
8.6.7	Discharges will be in accordance with requirements of the appropriate discharge permit.	<b>EPA#69</b>	072602
8.6.9	Amended to reflect noise control provisions	<b>EPA#50.b</b>	072602
8.9	Updated Reference listing and all ref cites in text.	<b>MYAPC</b>	090302 080102

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