November 18, 2002

Mr. Gregory M. Rueger
Senior Vice President, Generation
and Chief Nuclear Officer
Pacific Gas and Electric Company
Diablo Canyon Power Plant
P.O. Box 3
Avila Beach, CA 93424

SUBJECT: HUMBOLDT BAY POWER PLANT UNIT 3 - ISSUANCE OF AMENDMENT (TAC NO. MB4263)

Dear Mr. Rueger:

The Commission has issued the enclosed Amendment No. 34 to Facility Operating License No. DPR-7 for the Humboldt Bay Power Plant, Unit 3. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated December 28, 2000, as supplemented by letters dated March 29, 2001; October 31, 2001; December 21, 2001; and October 18, 2002.

The amendment converts the current technical specifications (CTS) for the Humboldt Bay Power Plant, Unit 3 to a set of Permanently Defueled Technical Specifications (PDTS) based on a format consistent with the standard technical specifications (NUREG-1430 through NUREG-1434).

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/
Drew Holland, Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-133

Enclosures: 1. Amendment No. 34 to DPR-7
2. Safety Evaluation

cc w/encls: See next page

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*For previous concurrences
see attached ORC

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PACIFIC GAS AND ELECTRIC COMPANY

DOCKET NO. 50-133

HUMBOLDT BAY POWER PLANT, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 34
License No. DPR-7

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Pacific Gas and Electric Company (the licensee), dated December 28, 2000, as supplemented by letters dated March 29, 2001; October 31, 2001; December 21, 2001; and October 18, 2002, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will be maintained in conformity with the application, as amended, the provisions of the Act, and the applicable rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with applicable portions of the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-7 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 34, are hereby incorporated in the license. Pacific Gas and Electric shall maintain the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance, including the incorporation of the revised Quality Assurance Program description that contains the relocated administrative control requirements as described in the licensee's March 29, October 31, and December 21, 2001 letters.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: November 18, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 34

FACILITY OPERATING LICENSE NO. DPR-7

DOCKET NO. 50-133

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number.

REMOVE	INSERT
All pages	All pages

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 34 TO FACILITY OPERATING LICENSE NO. DPR-7

PACIFIC GAS AND ELECTRIC COMPANY

HUMBOLDT BAY POWER PLANT, UNIT 3

DOCKET NO. 50-133

1.0 INTRODUCTION

By letter dated December 28, 2000, and supplemental letters dated March 29, 2001, October 31, 2001, December 21, 2001, and October 18, 2002, Pacific Gas and Electric Company (PG&E, the licensee) submitted a request for an amendment to Facility Operating License No. DPR-7 that would revise the current technical specifications (CTS) for the Humboldt Bay Power Plant, Unit 3 (HBPP) to a set of Permanently Defueled Technical Specifications (PDTS).

The December 21, 2001, and October 18, 2002, letters provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original no significant hazards consideration determination published in the *Federal Register* on December 26, 2001 (66 FR 66471).

During review of the licensee's original application, the staff determined that certain administrative control requirements should be relocated to the licensee's quality assurance plan (QAP) in accordance with the guidance of NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." Accordingly, the licensee submitted letters dated March 29 and December 21, 2001, that proposed changes to relocate these requirements to the licensee's QAP. The licensee would relocate certain CTS requirements to five licensee-controlled documents: (1) Defueled Safety Analysis Report (DSAR), (2) Emergency Plan (EP), (3) Security Plan (SP), (4) Quality Assurance Plan (QAP), and (5) Offsite Dose Calculation Manual (ODCM).

The licensee based its application partly on the previously approved PDTS for the Trojan Nuclear Plant and Millstone Unit 1. In addition, the licensee has utilized criteria of the Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors (39 FR 132) (FPS); 10 CFR 50.36, Technical Specifications; Standard Technical Specifications for Decommissioning BWR [Boiling Water Reactor] Power Plants (STS); Diablo Canyon Power Plant (DCPP) Technical Specifications (TS); Generic Letter (GL) 89-01, "Guidance for the Implementation of Programmatic Controls for RETS [Radiological Effluent Technical

Specifications] in the Administrative Controls Section of Technical Specifications and the Relocation of Procedural Details of Current RETS to the Offsite Dose Calculation Manual or Process Control Program;" AL 95-06; and Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation)," February 1978.

2.0 BACKGROUND

With regard to the provisions of Section 50.82 of Title 10 of the Code of Federal Regulations, HBPP had permanently ceased operation with the fuel permanently removed from the reactor vessel prior to the issuance of the rule and, consequently, was not required to provide a certification under the provisions of 10 CFR 50.82(a). PG&E is prohibited by 10 CFR 50.82(a)(2) from operating the plant or placing fuel in the reactor vessel. PG&E has determined that major changes to the CTS are necessary to reflect the permanently shutdown and defueled status of the plant. Therefore, PG&E submitted a proposed license amendment that would replace the entire CTS with a new set of TS to reflect the permanently shutdown and defueled status of the plant.

In 10 CFR 50.36, the NRC established its regulatory requirements related to the content of TS. In doing so, the NRC placed emphasis on those matters related to the prevention of accidents and mitigation of accident consequences; the NRC noted that applicants were expected to incorporate into their TS "...those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." (Statement of Consideration, Technical Specification for Facility Licenses; Safety Analysis Reports," 33 FR 18610 (December 17, 1968).) Pursuant to 10 CFR 50.36, TS are required to include items in the following five categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. However the rule does not specify the particular requirements to be included in a plant's TS.

On July 23, 1993, the NRC issued its Final Policy Statement (FPS), expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Atomic Energy Act of 1954, as amended (the Act), and 10 CFR 50.36 (58 FR 39132). The FPS gives guidance for evaluating the required scope of the TS and defined the guidance criteria to be used in determining which of the LCOs and associated SRs should remain in the TS. The FPS established four criteria to define the scope of equipment and parameters to be included in the improved STS LCOs. TS LCOs that do not satisfy any of these four criteria may be removed from the TS and relocated to licensee controlled documents. These criteria were developed for licenses authorizing operation; nevertheless, these criteria, now codified by 10 CFR 50.36, are the source of the TS requirements for safe storage of spent fuel. A general discussion of these considerations is provided below.

Criterion 1 of 10 CFR 50.36(c)(2)(ii)(A) states that the TS LCOs must be established for "[i]nstalled instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary." Since no fuel is present in the reactor coolant pressure (RCP) boundary at HBPP, this criterion is not applicable.

Criterion 2 of 10 CFR 50.36(c)(2)(ii)(B) states that TS LCOs must be established for "[a] process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." The purpose of this criterion is to capture those process variables that have initial values assumed in the design basis accident (DBA) and transient analysis, and which are monitored and controlled during power operation. While this criterion was developed for operating reactors, there are some DBAs that continue to apply to a plant authorized only to handle, store and possess nuclear fuel. The scope of DBAs applicable to a plant with a reactor that is permanently shut down and defueled is markedly reduced from those postulated for an operating plant.

Criterion 3 of 10 CFR 50.36(c)(2)(ii)(C) states that TS LCOs must be established for "[a] structure, system or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." The intent of this criterion is to capture into the TS only those structures, systems or components (SSCs) that are part of the primary success path of a safety sequence analysis. Also captured by this criteron are those support and actuation systems that are necessary for items in the primary success path to successfully function. The primary success path for a safety sequence analysis consists of a combination and sequence of equipment needed to operate (including consideration of the single failure criterion), so that the plant response to DBAs and transients limits the consequences of these events to within the appropriate acceptance criteria. While there are no transients that continue to apply to HBPP, there are some DBAs that continue to apply to a plant authorized only to handle, store, and possess nuclear fuel. As stated above, the scope of DBAs applicable to a plant with a reactor that is permanently shut down and defueled is markedly reduced from those postulated for an operating plant.

Criterion 4 of 10 CFR 50.36(c)(2)(ii)(D) states the TS LCOs must be established for SSCs "...which operating experience or probalbilistic risk assessment has shown to be significant to public health and safety." The intent of this criterion is that risk insights and operating experience be factored into the establishment of TS LCOs.

Addressing administrative controls, 10 CFR 50.36(c)(5) states that they "...are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner..." The particular administrative controls to be included in the TS, therefore, are the provisions that the Commission deems essential for the safe operation of the facility that are not already covered by other regulations. Accordingly, the staff has determined that administrative control requirements that are not specifically required under Section 50.36(c)(5), and which are not otherwise necessary to obviate the possibility of an abnormal situation or an event giving rise to an immediate threat to the public health and safety, may be relocated to more appropriate documents (e.g., QAP, SP, or EP), which are subject to regulatory controls. Similarly, while the required content of TS administrative controls is specified in 10 CFR 50.36(c)(5), particular details may be relocated to licensee-controlled documents, where other regulations provide adequate regulatory control.

In April of 1995, the Commission issued NUREG-1433, "Standard Technical Specifications, General Electric Plants (BWR/4)." This NUREG provides a set of standardized TS evaluated by the staff and found to be acceptable for an operating boiling water reactor (BWR/4) to meet the criteria provided in the Commission's Final Policy Statement for Nuclear Reactors dated July 22, 1993.

Coincident with the change to reflect the change in plant status, the requested amendment incorporates Standard TS (STS) guidance provided by the NRC. In some cases the licensee proposed deleting certain CTS items in order to bring HBPP more in line with current regulatory positions on TS content as described in NUREG-1433.

3.0 EVALUATION

The licensee has chosen to simplify their CTS to a set of PDTS which is more appropriate for their SAFSTOR plant conditions for decommissioning. To assess each one of the proposed changes, the licensee has utilized the Final Policy Statement (FPS), 10 CFR 50.36, AL 95-06, and GL 89-01. In addition, the licensee utilized the staff-approved PDTS for Millstone Unit I and the Trojan Nuclear Plant to provide guidance in the development of their PDTS.

This evaluation addresses each change being proposed. Text provided in describing individual changes is substantially the same as what the licensee provided in their application. The change numbering is as follows. An item specific change number provides an identifier for its corresponding description/justification and indicates the type of no significant hazards consideration (NSHC) used. An example of a change number is of the form I-LG-003. The prefix number (i.e., I in this example) refers to the section of the CTS where the change originated. It might also refer to the CTS section to which a new requirement is being added. The middle characters of the change number (i.e., LG in this example) indicates the type of NSHC used in the justification. The character sets include A, LG, N or D which are defined below. The last set of numbers (i.e. 003 in this case) is an assigned number to identify a specific change within a given section of the CTS (i.e., having the same prefix number.)

The following are the four types of dispositions for the proposed changes to the CTS:

"A" - This identifies an administrative type change that is either editorial in nature; involves the movement of requirements within the CTS without affecting their technical content; a simple reformat of a requirement or a clarification of a CTS (i.e., deleting a footnote no longer applicable due to a technical change to a requirement). It may also include non-technical changes made to conform to the more standard Millstone Unit 1 and/or Trojan PDTS.

"D" - This identifies a change where information in the CTS is being deleted when applying 10 CFR 50.36 criteria and it is either information which (1) duplicates other regulatory requirements, or (2) has no application in the proposed HBPP PDTS. Deletions can include information such as: definitions or titles that are not used in the PDTS; requirements that duplicate other regulatory requirements that must be met by the licensee; or general introductory descriptions to sections in the PDTS.

"LG" - This identifies a less restrictive change (no longer controlled by TS), which includes the relocation of CTS information to other licensee-controlled documents such as the PDTS Bases, DSAR or the ODCM. The LG type will include, in some cases, the movement of detailed information out of the CTS while the underlying requirements remain (e.g., the requirement for operability of the spent fuel pool (SFP) water level is retained as an LCO, but the system description is relocated to the DSAR). The LG type of change will also include the relocation of CTS requirements that do not meet the criteria in 10 CFR 50.36 (c)(2)(ii) for being retained in the PDTS. The CTS requirements affected by the application of these criteria are reflected in a screening process which provides the basis for not meeting TS retention criteria.

"N" - This identifies changes that add new requirements to the PDTS or provide new sections that may include the intent or control of previous CTS requirements. Typically these changes are made to conform to the more standard format.

Each change is evaluated below.

Table of Contents

The licensee has proposed to revise the Table of Contents to reflect the proposed changes to the CTS. They are conforming changes that result from other changes to the CTS. The changes are administrative in nature and are, therefore, acceptable.

Administrative ("A") Changes in CTS

I-A-002 (Relocation of Section Title, Definitions)

The title of Section I.B is moved to Section 1.1 of the PDTS. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-A-005 (Relocation of Definition of ELEVATION)

The definition of ELEVATION in Section I.B.3 of the CTS is moved to Section 1.1, Definitions, of the PDTS. This is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-A-006 (Relocation of Definition of OFFSITE DOSE CALCULATION MANUAL)

The definition of OFFSITE DOSE CALCULATION MANUAL in Section I.B.4 of the CTS is moved to Section 5.6.1 of the PDTS. The definition in Section I.B.4 is a program description and is more appropriately included in the Administrative Controls section of the PDTS. In addition to this definition are words that completely define the ODCM content and program. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-A-009 (Relocation of Definitions OPERABLE and OPERABILITY)

The definitions of OPERABLE and OPERABILITY in Section I.B.5 of the CTS are relocated to Section 1.1, Definitions, of the PDTS. This is consistent with 10 CFR 50.36 and is, therefore, acceptable.

II-A-001 (Description of HBPP Location)

The information in Section II.A of the CTS involves the description of the location of HBPP and is moved verbatim to Section 4.1, "Site Location," under Design Features in the PDTS. Design features, such as site location, meet the requirements of 10 CFR 50.36 and should remain in the PDTS. This is, therefore, acceptable.

III-A-005 (Description of Storage of Spent Fuel Assemblies)

The middle paragraph in Section III.A.2 of the CTS describes the storage of spent fuel assemblies, and will be modified for clarification and moved to Section 4.0, "Design Features" of the PDTS. The use of neutron absorbing containers to store spent fuel assemblies is credited in mitigation of design basis accidents at HBPP and is considered important to safety. These containers are designed to prevent criticality if the fuel storage racks were to fail and must be maintained. The words in this paragraph have been modified to provide clarification that allows the removal of a fuel assembly from the container for occasional visual inspection of the assembly and/or the container. This clarification is required to reflect statements in Section 4.2 of the NRC SE dated April 19, 1987, and Section 5.3.3 of the DSAR.

III-A-007 (SFP Water Level Information)

The information in Section III.B.2.a of the CTS concerning the water level of the SFP and the requirements associated with it are being moved to Section 3.1.1, "Fuel Storage Pool Water Level," in the PDTS. In the CTS, there is a defining statement that provides a reference between the SFP water level and the main floor of the refueling building (RFB). The level, as defined in the PDTS, is based on an elevation and does not require this reference to the floor. As such, this information in the parenthetic remark concerning the floor elevation is considered unnecessary and will not be included in the PDTS. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

III-A-008 (Information on the SFP Liner Water Level)

The information in Section III.B.2.a of the CTS concerning the water level of the liner is moved to Section 3.1.3, "Fuel Storage Pool Liner Water Level," in the PDTS. The content is the same, but the format was changed to be consistent with that being used for the HBPP PDTS. This retention is consistent with 10 CFR 50.36. In Section III.B.2.a of the CTS there is a parenthetic clarification regarding the liner water level and the main floor of the RFB. The level, as defined in the PDTS, is based on an elevation and does not require this reference to the floor to be

maintained. As such, this information is considered unnecessary and will not be included in the PDTS. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

III-A-013 (Boral Can Neutron Absorber Surveillance Program)

The information in Section III.B.3 of the CTS and associated requirements will be moved to Section 5.6.5, "Neutron Absorber Surveillance Program," in the PDTS with minor editorial changes. Neutron absorbing Boral cans are considered important to safety in the HBPP design to assure spent fuel K_{eff} (effective neutron multiplication factor) will remain less than 0.95. Therefore, this program is being maintained and controlled in the PDTS. The relocation in the PDTS of this requirement with the editorial changes is consistent with the Final Policy Statement and 10 CFR 50.36 and is, therefore, acceptable.

VII-A-001 (Responsibility Section)

The information in Section VII.A of the CTS is applicable in the PDTS and is moved to Section 5.1, "Responsibility," as paragraph 5.1.1. This section defines the responsibilities of the Plant Manager. The change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-004 (Onsite and Offsite Organizations Section)

The information in Section VII.B of the CTS is moved to Section 5.2.1, "Onsite and Offsite Organizations," of the PDTS and is modified. It references the QAP for information pertaining to organization, job descriptions, etc. The information in this section has been modified to reflect the more generic position titles, which allow flexibility in the actual titles of the personnel in those positions. This flexibility does not remove responsibility from any specific position, but allows for organizational title changes without requiring a license amendment. The information is also modified to provide clarification of responsibilities, and to add those who have to train Certified Fuel Handlers to the group that is to have sufficient organizational freedom to ensure their ability to perform their assigned functions. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-005 (Requirements for Shift Operating Organization)

The information in Section VII.C.1.a of the CTS is moved to Section 5.2.2.a and Table 5.2-1, "Minimum Shift Crew Composition," of the PDTS. The information in this section has been modified to provide clarification of staff requirements. The information on the minimum shift crew was moved directly into Table 5.2-1 of the PDTS. There was also a note added to the table that allows for the minimum shift complement to be reduced for not more than two hours. This is necessary because the shift complement is only two and there is some potential that an unexpected absence could arise. The DSAR will be revised to provide additional guidance on minimum staffing. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-006 (Certified Fuel Handler Shift Manning Requirements)

The information in Section VII.C.1.b of the CTS is moved to Section 5.2.2.b of the PDTS. This is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-007 (Control Room Requirements)

The information in Section VII.C.1.c of the CTS is moved to Section 5.2.2.c of the PDTS, verbatim. This section provides the requirement for either the Unit 3 control room to be continuously manned or, as an alternative, audible and visual annunciation of all alarms in Unit 3 shall be provided in a Unit 1 or 2 continuously manned control station. This is consistent with 10 CFR 50.36. This information is specific to HBPP (e.g., use of control room for Units 1 or 2) and will ensure required monitoring of Unit 3 functions. This change is acceptable.

VII-A-009 (Spent Fuel Handling Requirements for Manning)

The information in Section VII.C.1.d of the CTS has been modified and is moved to Section 5.2.2.e of the PDTS. The modification is consistent with Section 5.2.2.a of the STS for Permanently Defueled BWR Plants (BWROG-99075). It does not change the intent of the CTS section in that it requires a qualified individual to directly supervise the operation. This change is also consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-012 (Plant Staff Qualifications)

The general intent of the information in Section VII.C.2 of the CTS is being moved to Section 5.3.1, "Facility Staff Qualifications," of the PDTS. However, the specific information contained for the various plant staff position qualifications is being relocated to the DSAR. This is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-015 (Training Section)

Some of the information contained in Section VII.C.4 of the CTS is being modified and moved to Section 5.4, "Training," of the PDTS. The information being moved pertains to the Certified Fuel Handler training. The modification provides clarification that the Certified Fuel Handler training and retraining programs are to be NRC approved. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-019 (Detailed Procedures)

Some of the information contained in Section VII.E.1 of the CTS is being modified and moved to Section 5.5.1 of the PDTS. The modification involves the elimination of the details of the content of the procedures that are to be established and maintained. Although this level of content is necessary in these procedures, it is not necessary to be controlled in the PDTS. Removal of the details does not change the intent of the PDTS requirements. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-020 (Fuel Handling Procedures)

The information in Section VII.E.1.a of the CTS on fuel handling procedures is moved to Section 5.5.1.d of the PDTS, verbatim. This is consistent with 10 CFR 50.36 criteria and is, therefore, acceptable.

VII-A-030 (Fire Protection Program Implementation)

The information in Section VII.E.1.k of the CTS on fire protection program implementation is moved to Section 5.5.1.b of the PDTS, verbatim. This is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-038 (Radiological Effluent Controls Program)

The information in Section VII.F of the CTS is being moved to Section 5.6.4 of the PDTS. Item 7 of PDTS Section 5.6.4 uses existing limits in Section VII.F.7 of the CTS. HBPP prefers to retain the existing NRC previously approved CTS limits for gaseous effluents to avoid changing plant procedures and alarm setpoints. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-040 (Radiological Sampling, Analysis and Reporting)

The intent of the reporting requirements in Section VII.G.1 of the CTS is moved to Section 5.7.2 of the PDTS. The PDTS for the annual radiological environmental monitoring report for HBPP is virtually identical to the Millstone Unit 1 and Trojan PDTS for this report except for the following differences: (a) Trojan and Millstone report the results of analyses of **all** radiological environmental samples and of **all** environmental radiation measurements taken at **locations** specified in the ODCM. The HBPP ODCM contains monitoring stations that are classified as quality related or elective. Currently, HBPP reports the results of the quality related stations only. In order for HBPP to maintain the same level of current reporting, the PDTS will not include the word "all" as shown above in bold and underlined, and will add the words "quality related" before the word "locations" shown in bold and underlined; (b) the Millstone report is due to be submitted by May 1, while the Trojan report is due by May 15. The HBPP CTS requires the report by April 1. HBPP proposes to submit the report by May 1 to be consistent with the Millstone PDTS. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-044 (Reporting Requirements)

The title and introduction information in Section VII.J of the CTS has been modified and moved to Section 5.7 of the PDTS. This has been modified to state: "The following reports shall be submitted in accordance with 10 CFR 50.4." This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-046 (Annual Radiological Monitoring Report Requirements)

The information in Section VII.J.1 of the CTS is being modified and moved to Section 5.7.2. of the PDTS. The modifications are being performed to clarify and enhance the descripton of the required report and its content. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-048 (Annual Radioactive Effluent Release Report Requirements)

The Annual Radioactive Effluent Release Report requirements in Section VII.J.3 of the CTS are being modified and moved to Section 5.7.3 of the PDTS. The modifications are being made to clarify and enhance the description of the required report and its content. The modifications are consistent with 10 CFR 50.36 and are, therefore, acceptable.

VII-A-052 (High Radiation Area Requirements)

The information in Section VII.M of the CTS is being modified and moved to Sections 5.8.1 and 5.8.2 in the PDTS. The intent of this information is not modified; however, the format is. The format and content are consistent with the Diablo Canyon Power Plant (DCPP) TS Sections 5.7.1 and 5.7.2 and the proposed BWROG-99075. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-054 (Offsite Dose Calculation Manual)

The information in Section VII.O of the CTS is being modified and moved to Section 5.6.1 of the PDTS. The modifications are to clarify the existing information. This information will be added to the overall ODCM program that is contained in Section 5.6.1 of the PDTS. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-A-055 (Surveillance Time Interval Extension)

The 25 percent allowable extension on surveillance intervals in Section VII.I of the CTS is moved to Section Surveillance Requirement Applicability, SR 3.0.2. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

Items to be Deleted ("D") from CTS

I-D-001 (Scope Section)

Section I.A describes the purpose and intent of the custom HBPP CTS. It also includes a summary of each section of the CTS. With the conversion to the PDTS, the format content is standardized based on the plant design such that this section is no longer needed. Therefore, this section is deleted. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-D-003 (Administrative Controls Definition)

The definition of ADMINISTRATIVE CONTROLS in Section I.B.1 of the CTS is deleted. The definition is not used in the text of the PDTS. Administrative controls are proposed to be included in PDTS Section 5.0 and are specifically discussed. The absence of this definition in the PDTS is consistent 10 CFR 50.36 and is, therefore, acceptable.

I-D-004 (Design Features Definition)

The definition of DESIGN FEATURES in Section I.B.2 of the CTS is deleted. The definition is not used in the text of the PDTS as a defined term. Design features are specifically discussed in PDTS Section 4.0 and no further definition is required. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-D-010 (Operating Limits Definition)

The definition of OPERATING LIMITS in Section I.B.6 of the CTS is deleted. The term operating limits is not used in the text of the PDTS as a defined term. The information contained in sections of the CTS defined by this term has been relocated out of the PDTS, moved to other sections of the PDTS, or deleted. The absence of this definition in the PDTS is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-D-011 (Operating Requirements Definition)

The definition of OPERATING REQUIREMENTS in Section I.B.7 of the CTS is deleted. The term operating requirements is not used in the text of the PDTS as a defined term. The information contained in sections of the CTS defined by this term has been relocated out of the PDTS, moved to other sections of the PDTS, or deleted. The absence of this definition in the PDTS is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-D-013 (SAFSTOR Definition)

The definition of SAFSTOR in Section I.B.9 of the CTS is deleted. The term SAFSTOR defines a condition of the plant when the fuel is in monitored protective storage until final decommissioning. The PDTS controls the SAFSTOR condition. However, the term SAFSTOR is not specifically used in the text of the PDTS as a defined term and is therefore not required to be defined. The absence of this definition in the PDTS is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-D-014 (Spent Fuel Definition)

The definition of SPENT FUEL in Section I.B.10 of the CTS is deleted. All of the fuel at HBPP is currently in the spent fuel storage pool (SFP) and is handled in the same manner. The term spent fuel is not used in the text of the PDTS as a defined term. The absence of this definition in the PDTS is consistent with 10 CFR 50.36 and is, therefore, acceptable.

III-D-002 (Information Pertaining to Structures)

The information in Section III of the CTS is general information that summarizes the content of a section in the CTS. That section is not applicable to the PDTS. Therefore, this information is deleted. The deletion of this information is consistent with 10 CFR 50.36 and is, therefore, acceptable.

IV-D-001 (Introductory Paragraph to Service Systems Section)

This is an introductory paragraph to Section IV of the existing CTS and provides summary descriptive information. This information is not considered necessary in the PDTS. Therefore, it is deleted. This deletion is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-D-014 (Fire Protection Program)

The information in Section VII.C.3 of the CTS is being deleted to be consistent with 10 CFR 50.36. Procedures that control the implementation of a fire protection program are contained in Section 5.5.1 of the PDTS. Information on the Fire Protection Program is contained in detail in the DSAR, where it can be controlled. Section VII.C.3 only refers to the maintenance and implementation of a program as it is described in the DSAR. Section 5.5.1 of the PDTS requires the procedures for maintenance and implementation of that same program. Furthermore, in the NRC SE dated August 31, 2000, that issued Amendment No. 33 to the HBPP CTS, the NRC stated "PG&E does not need to include the fire protection license condition.... in order to relocate the fire protection requirements to the DSAR." This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-D-047 (Non-routine Reports)

The information in Section VII.J.2 of the CTS is a statement of the requirements for each licensee to report non-routine events under 10 CFR 50.72 and 50.73. The information in this section is deleted. This information is a general requirement of the industry that does not need specific PDTS control since it is required by 10 CFR 50.72 and 50.73. This change is also consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-D-049 (Special Reports)

The information in Section VII.J.4 of the CTS is being deleted. The reporting requirement is contained in the Code of Federal Regulations in that conformance is a condition of the operating license. Therefore, specific identification of this requirement in the PDTS would be duplicative and is not necessary. This deletion is consistent with 10 CFR 50.36 and is, therefore, acceptable.

Changes to Items No Longer Contolled By TS ("LG")

I-LG-012 (Process Control Program Definition)

The definition of PROCESS CONTROL PROGRAM in Section I.B.8 of the CTS is relocated to Section 1.14 of the ODCM. The definition in Section I.B.8 of the CTS is a program description and is more appropriately included in the ODCM where this program is controlled and maintained. This relocation is consistent with 10 CFR 50.36 criteria because this definition is not a safety limit, limiting safety system setting, limiting control setting, design feature, or administrative control. This change is acceptable.

II-LG-002 (Plant Areas Relocated to the ODCM)

The information in Section II.B of the CTS pertains to the unrestricted area used as input to the offsite dose calculations. This information is moved to the ODCM where it is more appropriately controlled. Its relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or design feature. The proposed change is consistent with the guidance in GL 89-01 and NUREG-1433. Although the information contains a specific administrative control, administrative controls for the ODCM exist in Section 5.6.1 of the PDTS. This change is acceptable.

II-LG-003 (Site and Principal Activities)

The information in Section II.C of the CTS provides general overview information on the activities at HBPP. It is relocated to the DSAR. Its relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, design feature, or administrative control. This change is acceptable.

II-LG-005 (Figure II-1)

Figure II-1 in Section II of the CTS shows the unrestricted area used as input to the offsite dose calculations. It is relocated to the ODCM where it is more appropriately controlled. Its relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, design feature, or administrative control. It is, therefore, acceptable.

III-LG-003 (Refueling Building)

The information in Section III.A.1 of the CTS provides physical descriptions of a design feature (i.e., the RFB and its penetrations). This type of information is not applicable to the PDTS format and is therefore not included. However, this information does contain the description of some operational configurations that are maintained for functionality of the building. This building is discussed in the DSAR; therefore, these operational configurations are considered necessary to ensure the function of the RFB. As a result, this information is being relocated to the DSAR and the operational configurations will be controlled by plant procedures. This

relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, the RFB does not have a significant effect on safety, and, thus, does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. Relocating this information is, therefore, acceptable.

III-LG-004 (Description of Spent Fuel Pool)

The information in Section III.A.2 of the CTS describes a physical design feature (i.e., the SFP), and will be relocated to the DSAR, with the exception of the paragraph concerning storage in neutron absorbing material, which is discussed in change number III-A-005. Section III.A.2 of the CTS provides physical descriptions of the SFP, liner and the cover provided over the SFP. Although the SFP is important in function, the information provided here is a description of the design features and can be controlled in the DSAR. The controlling LCO for the SFP is the water level, which is retained in the PDTS as LCO 3.1.1. In addition, the pool cover is not a design feature that is credited to mitigate any design basis accidents (DBAs). The relocation of this information is consistent with 10 CFR 50.36 and is, therefore, acceptable.

III-LG-006 (Visual Inspection of Refueling Building)

Section III.B.1 of the CTS requires a visual inspection of the RFB at least quarterly. The results of that inspection shall be evaluated with regard to functionality of the RFB for weather, contamination control and radiation shielding. However, this evaluation does not have any specified action requirements. As such, it does not meet the intent of an LCO and is not required to be retained in the PDTS according to 10 CFR 50.36. In addition, although the RFB is a design feature at HBPP, it is not significant to safety and is not credited in the HBPP accident analyses. As a result, it does not meet the 10 CFR 50.36 criteria for a design feature to be maintained in the PDTS. Since this building is discussed in the DSAR, this inspection and evaluation requirement is considered prudent to ensure its integrity. Therefore, it is being relocated to the DSAR and will continue to be controlled by plant procedures. This commitment is for monitoring connection bolts because these bolts are required to maintain the control-auxiliary-fuel building complex during an earthquake. The HBPP design basis does not include seismic requirements for any structures, systems or components. The HBPP accident analyses do not take credit for the integrity of the RFB, and the resultant offsite releases are well below regulatory limits. The proposed relocation of the requirement verbatim into the DSAR will ensure that any future changes to the requirement will be evaluated under 10 CFR 50.59. In addition, the RFB quarterly visual inspection requirement contained in the HBPP CTS is currently performed under an existing plant procedure, which also requires evaluation under the 10 CFR 50.59 process. It should also be noted that this inspection is not contained in the proposed STS for Permanently Defueled BWR Plants (BWROG-99075). This relocation is consistent with 10 CFR 50.36 and is, therefore, acceptable.

III-LG-009 (Main Floor Elevation of the RFB Compared With SFP Liner Level)

The information in Section III.B.2.a of the CTS concerning the main floor elevation of the RFB is provided in the CTS as a comparison to the SFP and liner gap water levels. It is descriptive in nature. It will be relocated to the DSAR, which describes the RFB. This relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, the RFB does not have a significant effect on safety, and thus does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. The relocation of this information is acceptable.

III-LG-010 (SFP Water Quality)

The information in Section III.B.2.b of the CTS and associated requirements will be relocated to the DSAR, in accordance with 10 CFR 50.36. However, the requirements for the maintenance of water chemistry will be controlled under Section 5.6.3 Fuel Storage Pool Water Chemistry Program in the PDTS. The radioactivity concentration of the SFP water is considered for the potential effects of DBAs. However, the chemical water quality is not required or credited in the mitigation of any DBAs. The chemical water quality is intended to preserve the function of the Boral (neutron absorbing material). Therefore, chemistry maintenance is considered important, and programmatic control should be retained in the PDTS. This program and the NRC notification requirements for changes are included in the PDTS to ensure water quality control. This change is acceptable.

III-LG-011 (SFP Water Quality 30-Day Reporting Requirement)

The 30-day reporting requirement in Section III.B.2.b of the CTS will be relocated to the DSAR. Although water quality is considered in the potential effects of DBAs, it is not considered in the mitigation of those DBAs. The 30-day reporting requirement is not required by regulations and is considered to be a plant-specific commitment to the NRC. As such, it is being relocated to the DSAR where it will be controlled as a commitment. This relocation is consistent with 10 CFR 50.36 criteria because the 30-day report is not a safety limit, limiting safety system setting, limiting control setting, design feature, or administrative control that affects plant safety. The relocation of this information is acceptable.

III-LG-014 (Physical Description of RFB Features)

The information in Table III-1 of the CTS describes physical design features of the plant and will be relocated to the DSAR. The information provided is a physical description of design features of the RFB and its penetrations. This information does contain the description of some operational configurations that are maintained for functionality of the RFB. Although the RFB and its penetrations are not credited directly for the mitigation of an accident, the RFB is discussed in the DSAR. Therefore, these operational configurations are considered necessary to ensure the function of the RFB. As a result, this information is being relocated to the DSAR and the operational configurations will be controlled by plant procedures. This relocation is

consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, this design feature does not have a significant effect on safety and, thus, does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. The relocation of this information to the DSAR is acceptable.

III-LG-015 (Table Containing Limits On SFP Water Chemistry and Activity)

Table III-2 provides limits for SFP water chemistry and activity during SAFSTOR. These limits will be controlled and implemented under the general requirements of Section 5.6.3, "Fuel Storage Pool Water Chemistry Program," of the PDTS. As such, the specific limits in Table III-2 will be relocated and controlled in the DSAR. Although the program controlling this information is being maintained in the administrative controls section of the PDTS, this specific information does not meet the 10 CFR 50.36 criteria for being maintained and is being relocated. This relocation is acceptable.

IV-LG-002 (Physical Description of the RFB Ventilation System)

Section IV.A.1 of the CTS provides a physical description of the RFB ventilation system. This information does contain some description of operational configurations that are maintained for system functionality. Although the ventilation system provides an important function, it is not credited directly for the mitigation of any applicable DBA. Therefore, the CTS information is a description of features that can be controlled in the DSAR. The operational configurations are considered necessary to ensure system functionality. As a result, this information is being relocated to the DSAR and the operational configurations will be controlled by plant procedures. This relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, this design feature does not have a significant effect on safety and, thus, it does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. The relocation of this information is acceptable.

IV-LG-003 (Physical Description of the Components and Available Sources of Water for the SFP Service System)

Section IV.A.2 of the CTS provides a physical description of the components and available sources for the SFP service system. This section does contain some operational configuration information that supports maintaining functionality. Although the SFP service system provides an important function, it is not credited directly in the mitigation of any applicable DBAs. Therefore, the CTS information is considered a description of the features that can be controlled in the DSAR. The operational configurations are considered necessary to ensure system function. As a result, this information is being relocated to the DSAR and the operational configurations will be controlled by plant procedures. This relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant;

however, this design feature does not have a significant effect on safety and, thus, it does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. This relocation is acceptable.

IV-LG-004 (Electrical System Description)

The information provided in Section IV.A.4 of the CTS is a summary description of the electrical system. The electrical system described in the CTS provides power to the unit's electrical equipment. However, the CTS specifically requires service to only the emergency lighting, main annunciator system and several process and area monitors. No other equipment is indicated or discussed in these requirements. Although ensuring power to this equipment is prudent, this equipment is not credited for prevention or mitigation of any applicable DBAs. In addition, loss of any of this equipment will not increase the consequences of any DBAs. In all cases, the functions of this equipment can be supplied by an alternative source within a reasonable time, such as a portable generator(s) or a portable monitor(s). As a result, these electrical requirements will not be retained in the PDTS. However, having the availability of this electrical equipment is prudent and is a benefit to operation. Therefore, this information, including the system surveillance requirements, will be relocated to the DSAR and controlled by plant procedures. This relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, this design feature does not have a significant effect on safety and, thus, does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. This relocation is acceptable.

IV-LG-005 (RFB Ventilation System Operating Requirements)

The information in Section IV.B.1 of the CTS describes the RFB ventilation system operating requirements. Although this ventilation system provides an important function, it is not credited directly for the mitigation of any applicable DBA nor does it have a significant effect on safety. Therefore, it does not meet the 10 CFR 50.36 criteria for being maintained in the PDTS. As a result, the operating requirements will be relocated to the DSAR. This relocation is acceptable.

IV-LG-006 (Demineralized Water Tank Volume)

The operating requirements in Section IV.B.2.a of the CTS will be relocated to the DSAR. The maintenance of the level in the SFP is considered an important item in the TS for a defueled plant. As such, an LCO for the verification of the level is retained in Section 3.1.1 of the PDTS and requires verification once every twenty-four hours. This LCO requires the capability of immediate makeup as the mitigating action that indicates that the service systems need to be available. However, the source or amount of that makeup is not specific and could be any water source. Therefore, the specific systems listed in Section IV.B.2.a of the CTS do not meet the criteria for retention in the PDTS. This position is consistent with the PDTS for Millstone and Trojan. In accordance with the analyses of the applicable DBAs, the entire volume of water in the SFP can be lost without criticality or adverse effect on the public due to thermal degradation of the spent fuel. The analysis also states that the water shielding or an alternative must be reestablished to allow repairs and to mitigate potentially adverse effects over time. As

a result of these analyses, immediate recovery of the water level or makeup to it is not a priority to mitigate any applicable DBAs. Although shielding must be reestablished, the time interval would allow ample time to establish an alternative source if the normal makeup system was unavailable. Therefore, a volume of 2000 gallons in the demineralized water tank is not specifically required to mitigate any DBA and it is not necessary to maintain this requirement in the PDTS. However, the demineralized water tank is the primary source and should be maintained functional. Therefore, the requirement for maintaining the volume in the tank will be relocated to the DSAR and controlled by plant procedures. This relocation is consistent with 10 CFR Part 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, this design feature does not have a significant effect on safety and, thus, it does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. This relocation is acceptable.

IV-LG-007 (Verification of SFP Liner Gap Pump Operability)

The SFP service system requirement in Section IV.B.2.b of the CTS will be relocated to the DSAR. The SFP liner was installed as a result of identified leakage from the SFP early in the operation of Unit 3. The spent fuel pool liner gap or the pump is not credited to prevent or mitigate any applicable DBAs. As such, they will not be included in the PDTS. However, use of the liner gap pump is the primary way of maintaining liner gap level, which mitigates a leak in the liner and helps to determine any increase in deterioration of the liner. Therefore, the surveillance requirement for verifying the pump operable will be relocated to the DSAR and controlled by plant procedures. This relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, this design feature does not have a significant effect on safety and, thus, it does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. This relocation is acceptable.

IV-LG-008 (Electrical System)

The electrical system information in Section IV.B.6 of the CTS will be relocated to the DSAR. Currently the electrical systems that are contained in the CTS are there to provide power to the Unit's electrical equipment. However, the CTS specifically requires service to only the emergency lighting, main annunciator system, and several process and area monitors. No other equipment is indicated or discussed in these requirements. Although ensuring power to this equipment is prudent, this equipment is not credited for prevention or mitigation of any applicable DBAs. In addition, loss of any of this equipment will not increase the consequences of any DBAs. In all cases, these equipment functions can be supplied by an alternative source within a reasonable time, such as a portable generator or portable monitors. As a result, these electrical requirements will not be included in the PDTS. However, having the availability of this electrical equipment is prudent and a benefit to operation. Therefore, this information, including the system surveillance requirements, will be relocated to the DSAR and controlled by plant procedures. This relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, this design feature does not have a significant

effect on safety and, thus, it does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. The relocation of this information to the DSAR is acceptable.

V-LG-001 (Area Monitors and Portable Monitoring Equipment)

The information in Section V.A.3 of the CTS is a physical description of design features for area monitors and portable monitoring equipment, and will be relocated to the DSAR. This information contains the description of some operational configurations that are maintained for functionality. These monitors are not credited for the mitigation of any DBAs and do not meet the criteria for retaining them in the PDTS. As a result, this information is being relocated to the DSAR and the operational configurations will be controlled by plant procedures. This relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, this design feature does not have a significant effect on safety and, thus, it does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. This change is acceptable.

V-LG-002 (Physical Description of Design Features for the SFP Water Level Monitors)

The information in Section V.A.5 of the CTS is a physical description of design features for the SFP water level monitors and will be relocated to the DSAR. This information contains the description of some operational configurations that are maintained for functionality. Maintenance of the SFP level is an important feature; therefore LCO 3.1.1 is being maintained in the PDTS. However, the level monitors are not required or credited by that LCO for the mitigation of any DBAs. Although the monitors are important, they do not meet the criteria for maintenance in the PDTS. As a result, this information is being relocated to the DSAR and the operational configurations will be controlled by plant procedures. This relocation is consistent with 10 CFR 50.36 criteria because it is not a safety limit, limiting safety system setting, limiting control setting, or administrative control. It does describe a design feature of the plant; however, this design feature does not have a significant effect on safety, and, thus, it does not meet the criteria in 10 CFR 50.36 for inclusion in the PDTS. This relocation is acceptable.

V-LG-003 (Operating Limits for Radiation Monitors and Portable Radiation Monitoring Equipment)

The information in Section V.B.3 of the CTS is being relocated to the DSAR. The information provided in Section V.B.3 is operating limits and requirements for area monitors and portable monitoring equipment. This information contains operational and surveillance requirements that are to be maintained for functionality. Although these monitors provide an important function, they are not credited for the mitigation of any DBAs and do not meet the 10 CFR 50.36 criteria for retaining them in the PDTS. Therefore, this information is being relocated to the DSAR. Plant procedures and the overall radiation protection program will control the appropriate operational and surveillance requirements. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

V-LG-004 (Operating Limits and Requirements for SFP Water Level Monitors)

The information in Section V.B.5 of the CTS is being relocated to the DSAR. The information provided is operating limits and requirements for the SFP water level monitors. This information contains operational and surveillance requirements that are to be maintained for functionality. Although these monitors provide an important function, they are not credited for the mitigation of any DBAs and do not meet the 10 CFR 50.36 criteria for retaining them in the PDTS. As a result, this information is being relocated to the DSAR and the appropriate operational and surveillance requirements will be controlled by plant procedures. This relocation of information is acceptable.

V-LG-005 (Sealed Source Leak Testing)

The information in Section V.B.7 of the CTS is being relocated to the DSAR. The information provided is operating limits and reporting requirements for sealed source leak testing. The information is not credited for the mitigation of any DBAs, and does not meet the 10 CFR 50.36 criteria for retaining them in the PDTS. It will be relocated to the DSAR and controlled by plant procedures under the overall radiation protection program. This relocation is acceptable.

VI-LG-001 (Activity Limits In Outdoor Tanks)

The information in Section VI.B.1.f of the CTS will be relocated to the ODCM. All liquid and solid radioactive waste at HBPP is handled under the ODCM program as provided in Section 5.6.1 of the PDTS. The limits that are provided in the CTS will be relocated to the ODCM and implementation will be controlled by plant procedures. HBPP proposes to relocate this storage tank quantity requirement verbatim to the ODCM. This relocation is consistent with 10 CFR 50.36 criteria because, although this specific information is not retained in the PDTS, the administrative control of this information is being maintained in the PDTS. The relocation of this information is acceptable.

VI-LG-002 (Solid Radioactive Waste System)

The information in Section VI.B.2.a of the CTS will be relocated to the ODCM. All liquid and solid radioactive waste at HBPP is handled under the ODCM program as provided in Section 5.6.1 of the PDTS. The limits that are provided in the CTS will be relocated to the ODCM and implementation controlled by plant procedures. This relocation is consistent with 10 CFR 50.36 criteria because, although this specific information is not retained in the PDTS, the administrative control of this information is being maintained in the PDTS. The relocation of this information is acceptable.

VII-LG-013 (Plant Staff Qualifications)

The specific qualification information in Section VII.C.2 of the CTS is being relocated to the DSAR. The qualification requirements being relocated support the qualification statements that will be retained in Section 5.3.1 of the PDTS (see change VII-A-012). The relocated

information provides details that are not necessary in the PDTS and can be controlled in the DSAR. This is consistent with 10 CFR 50.36 criteria for providing administrative controls. This change is acceptable.

VII-LG-016 (Content of Training Programs)

The information in Section VII.C.4 of the CTS that is being relocated to the DSAR consists of details about the content of the training programs. This level of detail is not necessary to be retained in the PDTS. Maintaining it in the DSAR ensures that it is controlled under a 10 CFR 50.59 evaluation program, which is considered adequate control for this type of information. This relocation is consistent with 10 CFR 50.36 criteria and is acceptable.

VII-LG-017 (Plant Staff Review Committee)

Section VII.D.1 of the CTS is being relocated to the QAP. The information provided in this section details the purpose, membership, responsibilities, authority, and requirements for the Plant Staff Review Committee (PSRC). The CTS review and audit requirements are not necessary to assure safe operation of the facility. Review and audit requirements are specified in the QAP, as required by 10 CFR 50.54 and 10 CFR Part 50, Appendix B. These regulations control the requirements for all review and audit functions, except those associated with the SP and EP. Relocation of this portion of the CTS is consistent with the guidance provided in AL 95-06. The DCPP TS and the proposed STS for Permanently Defueled BWR Plants (BWROG-99075) do not refer to the PSRC or its responsibilities. The proposed HBPP PDTS follows the example of DCPP and BWROG-99075 for this information. This change is also consistent with 10 CFR 50.36 and, is, therefore acceptable.

VII-LG-018 (Nuclear Safety Oversight Committee)

Section VII.D.2 of the CTS is being relocated to the QAP. The information provided in this section details the purpose, composition, review responsibilities, and requirements for the Nuclear Safety Oversight Committee (NSOC). The CTS review and audit requirements are not necessary to assure safe operation of the facility. Review and audit requirements are specified in the QAP, as required by 10 CFR 50.54 and 10 CFR Part 50, Appendix B. These regulations control the requirements for all review and audit functions, except those associated with the SP and the EP. Relocation of this portion of the CTS is consistent with the guidance provided in AL 95-06. This change is also consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-LG-021 (Normal Startup, Operation, and Shutdown of Systems and Components Required During SAFSTOR)

The information in Section VII.E.1.b of the CTS is being relocated to the QAP. The intent of this information is included in Sections 5.5.1.a and 5.5.1.e of the PDTS. These procedures are included in those recommended in Appendix A of RG 1.33, "Quality Assurance Program Requirements (Operation)." This change is also consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-LG-022 (Systems and Components)

The information in Section VII.E.1.c of the CTS is being relocated to the QAP in accordance with 10 CFR 50.36. The intent of this information is included in Section 5.5.1.a of the PDTS. These procedures are included in those recommended in Appendix A of RG 1.33. This change is acceptable.

VII-LG-023 (Procedures for Responding to Emergency Conditions Involving the Unplanned Release of Radioactivity Relocated to the QAP)

The information in Section VII.E.1.d of the CTS is being relocated to the QAP in accordance with GL 93-07. The relocation of this requirement to the EP results in an equivalent level of regulatory authority since any change to the EP that results in a decrease in effectiveness of the plan must be reviewed by the NRC prior to implementation. The effect of the change is that the level of safety of plant operation is unaffected. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-LG-024 (Procedures for Emergency Operation of Systems and Components During SAFSTOR)

The information in Section VII.E.1.e of the CTS is being relocated to the QAP in accordance with 10 CFR 50.36. The intent of this information is included in Section 5.5.1.a of the PDTS. These procedures are included in those recommended in Appendix A of RG 1.33. This change is acceptable.

VII-LG-025 (Detailed Plant Security Plan Implementation Procedures)

The information in Section VII.E.1.f of the CTS is being relocated to the QAP in accordance with GL 93-07. The relocation of this requirement to the QAP results in an equivalent level of regulatory authority since a decrease in effectiveness of the plan must be reviewed by the NRC prior to implementation. The effect of the change is that the level of safety of plant operation is unaffected. This information is not included in Section 5.4.1 of BWROG-99075. In addition, this change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-LG-026 (Procedures for Surveillance Activities to Ensure TS Compliance)

The information in Section VII.E.1.g of the CTS is being relocated to the QAP in accordance with 10 CFR 50.36. The intent of this information is included in Section 5.5.1.a of the PDTS. These procedures are included in those recommended in Appendix A of RG 1.33. This is acceptable.

VII-LG-027 (Procedures to Calibrate Instrumentation Used In Complying With TS)

The information in Section VII.E.1.h of the CTS is being relocated to the QAP in accordance with 10 CFR 50.36. The intent of this information is included in Section 5.5.1.a of the PDTS. These procedures are included in those recommended in Appendix A of RG 1.33. This is acceptable.

VII-LG-028 (Procedures to Dispose of and Ship Radioactive Material)

The information in Section VII.E.1.i of the CTS is being relocated to the QAP in accordance with 10 CFR 50.36. The activities covered by these procedures are governed by 10 CFR Parts 20, 61, and 71. This is acceptable.

VII-LG-029 (Procedures to Maintain a Process Control Program)

The information in Section VII.E.1.j of the CTS is being relocated to the QAP in accordance with 10 CFR 50.36. The intent of this information is included in Section 5.5.1.e of the PDTS. These procedures are included in those recommended in Appendix A of RG 1.33. This change is acceptable.

VII-LG-034 (Procedure Review)

The information in Section VII.E.2 of the CTS is being relocated to the QAP. This information addresses procedure review and control requirements. Procedure review requirements are also specified in 10 CFR 50.36 and 10 CFR Part 50, Appendix B, as well as the HBPP QAP. Maintaining them in the PDTS is considered duplicative and unnecessary; therefore, they are relocated to the QAP. This change is consistent with the guidance provided in AL 95-06. The relocation is also consistent with the DCPP TS and BWROG-99075. This change is also consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-LG-035 (Control of Procedure Changes)

The information in Section VII.E.3 of the CTS is being relocated to the QAP. This information addresses procedure review and temporary change control requirements. Procedure review requirements are also specified in 10 CFR 50.36 and 10 CFR Part 50, Appendix B, as well as the HBPP QAP . Retaining them in the PDTS is duplicative and unnecessary; therefore, they are relocated to the QAP. This change is consistent with the guidance provided in AL 95-06. The relocation is also consistent with the DCPP TS and BWROG-99075. This change is also consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-LG-036 (Emergencies not Covered by Procedure)

The information in Section VII.E.4 of the CTS is being relocated to the QAP in accordance with 10 CFR 50.36. The intent of this information is included in Section 5.5.1.a of the PDTS. This is

a procedural guidance statement and its intent is implied in those procedures recommended in Appendix A of RG 1.33. This change is acceptable.

VII- LG-039 (Radiological Environmental Monitoring Program)

The detailed and plant specific radiological environmental monitoring requirements contained in Sections VII.G and VII.G.1 of the CTS will be relocated to the ODCM in accordance with 10 CFR 50.36. The details and description of the program are duplicative of the ODCM requirements. The program maintains consistency with the requirements of 10 CFR Part 50, Appendix I. The ODCM and other regulatory requirements provide sufficient control of these provisions, therefore, justifying relocation to the ODCM. This change is acceptable.

VII-LG-041 (Interlaborotory Comparison Program)

The Interlaboratory Comparison Program requirements in Section VII.G.2 of the CTS will be relocated to the ODCM. The intent of these requirements will be controlled under the procedures required in support of the QAP required in Section 5.5.1.c of the PDTS. This relocation is consistent with 10 CFR 50.36 criteria on administrative controls. This change is acceptable.

VII-LG-042 (Site Emergency Plan)

The information in Section VII.H of the CTS is being relocated to the HBPP EP. The relocation of this requirement to the HBPP EP results in an equivalent level of regulatory authority since reductions in effectiveness of the plan must be reviewed by the NRC prior to implementation. The effect of the change is that the level of safety of plant operation is unaffected. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-LG-043 (Surveillance Testing)

The information in Section VII.I of the CTS is being relocated to the DSAR in accordance with 10 CFR 50.36. The intent of this information is maintained in the PDTS in the various LCO surveillance sections. One exception to the relocation is the 25 percent allowable extension on surveillance intervals which is moved to Section 3.0, "Surveillance Requirement Applicability," (SR 3.0.2) of the PDTS (see VII-A-055). The 3.25 times total time interval for three consecutive tests and the statement requiring appropriate tests after maintenance are considered good practices, or are controlled by other regulatory controlled documents. They do not require being retained in the PDTS and are being relocated to the DSAR. This change is acceptable.

VII-LG-050 (Record Retention)

The information in Section VII.K of the CTS is being relocated to the QAP in accordance with 10 CFR 50.36. The requirement for retention of records related to activities affecting quality is contained in 10 CFR Part 50, Appendix B, Criteria XVII and other sections in 10 CFR Part 50 that are applicable to the plant (i.e., 10 CFR 50.71, etc.). Post-completion review of records

does not directly assure operation of the facility in a safe manner, as the activities described in the documents have already been performed. By retaining these requirements in a licensee-controlled document, any changes in these record retention requirements will be adequately controlled under the provisions of 10 CFR Part 50.54(a). This change is acceptable.

VII-LG-051 (Radiation Protection Program)

The information in Section VII.L of the CTS is being relocated to the DSAR in accordance with 10 CFR 50.36. Requirements to have a radiation protection program to implement 10 CFR Part 20 are contained in 10 CFR 20.1101(a). Periodic review of this program is required by 10 CFR 20.1101(c). Maintaining this section in the PDTS would be redundant with the regulations. This relocation is acceptable.

VII-LG-053 (Process Control Program Changes)

The intent of the information in Section VII.N in the CTS is contained and controlled in Section 5.6.1 of the PDTS. Currently, the Process Control Program (PCP) is contained in the HBPP ODCM. The PCP implements the requirements of 10 CFR Part 20, 10 CFR Part 61 and 10 CFR Part 71. Therefore, relocation of the description of the PCP from the CTS does not affect the safe operation of the facility. The HBPP PCP is controlled in the HBPP ODCM and HBPP proposes to pattern its PDTS such that PDTS 5.6.1 ODCM will provide control for this issue. This is also consistent with the DCPP TS and BWROG-99075. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

New ("N") Sections and/or Requirements

I-N-007 (ACTIONS Definition)

The definition of ACTIONS is added to Section 1.1 of the PDTS. It is to be used as a defined term in the PDTS in reference to limiting condition for operation (LCO) actions, which are to be taken. Its addition is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-N-008 (CERTIFIED FUEL HANDLER Definition)

The definition of CERTIFIED FUEL HANDLER is added to Section 1.1 of the PDTS. It is used as a defined term in the PDTS and provides a statement of the qualifications required. Its addition is consistent with 10 CFR 50.36 and is, therefore, acceptable.

I-N-015 (Logic Connectors, Completion Times, and Frequency)

Sections 1.2, "Logic Connectors;" 1.3, "Completion Times;" and 1.4, "Frequency" are added to the PDTS. These sections provide descriptions and examples of how to use the PDTS format. This addition is consistent with 10 CFR 50.36 and is, therefore, acceptable.

II-N-004 (Safety Limits)

Section 2.0, "Safety Limits" is added to the PDTS. This addition is a statement that the safety limits section does not apply to a permanently defueled facility. This section normally contains the safety limits for an operating plant which are based on reactor fuel fission limits while the fuel is in the reactor. These do not apply to a defueled plant. This is consistent with 10 CFR 50.36 and is, therefore, acceptable.

III-N-001 (LCO and Surveillance Requirement)

Section 3.0, "Limiting Condition For Operation (LCO) Applicability and Surveillance Requirements (SR) Applicability" is added to the PDTS. These sections define the requirements for meeting the LCOs and SRs contained in the PDTS and are necessary to be included to assure that the PDTS LCOs and SRs are correctly applied. This is consistent with 10 CFR 50.36 and is, therefore, acceptable.

III-N-012 (SFP Water Chemistry Program)

Section 5.6.3, "Fuel Storage Pool Water Chemistry Program" is added to the PDTS. The activity level of the SFP water is considered for the potential effects of DBAs. However, the water quality is not required or credited in the mitigation of any DBAs. Its maintenance is considered important, and programatic control should be retained in the PDTS. This addition is consistent with 10 CFR 50.36 and is, therefore, acceptable.

III-N-016 (Defueled Systems)

Section 3.1, "Defueled Systems" is added to the PDTS. This section contains three LCOs: 3.1.1, "Fuel Storage Pool Water Level;" 3.1.2, "Spent Fuel Pool Load Restrictions;" and 3.1.3, "Fuel Storage Pool Liner Water Level." The PDTS on the SFP water level contains the information from Section III.B.2.a of the CTS. Although there is an analysis for HBPP that has determined that a complete loss of water in the SFP will not result in any criticality potential, the water level in the SFP provides radiation shielding to protect plant workers and members of the public who may be onsite. Therefore, SFP water will be controlled in the PDTS. The CTS does not provide a required action but does include a statement that the SFP level must be maintained. The bases for these controls and surveillance frequencies are provided and maintained in the PDTS Bases section. The PDTS on fuel pool load restrictions is provided to limit the movement of loads over the spent fuel in the SFP racks. The bases for the LCO limitation and SR requirements are contained in the PDTS Bases section. The PDTS on SFP liner water level contains the information from Section III.B.2.a of the CTS. Maintaining the SFP liner level within the TS limits ensures that the SFP liner level remains below the SFP level and the exterior groundwater level. This is done to minimize the potential for leakage from the SFP to the groundwater surrounding the pool. Therefore, SFP liner water will be controlled in the PDTS. The CTS does not provide a required action but does include a statement that the SFP level must be maintained. To be consistent with the format of the HBPP PDTS, and to properly control this parameter, required actions, completion times, and surveillance

requirements are included in the PDTS. The bases for these controls and surveillance frequencies are provided and maintained in the PDTS Bases section. The inclusion of these requirements in the PDTS is consistent with 10 CFR 50.36 and is, therefore, acceptable.

IV-N-009 (Design Features)

Section 4.0, "Design Features" is added to the PDTS. This section includes 4.1, "Site Location" and 4.2, "Fuel Storage." The site location information exists in the CTS; however, the fuel storage information does not exist in the CTS. Section 4.1, "Site Location," contains the information previously provided in Section II.A of the CTS (see change II-A-001). This information is being moved verbatim. Section 4.2, "Fuel Storage" provides information on the K_{eff} limitation for the SFP and the basis reference of a PG&E calculation. That calculation also includes and is based on the limit on the number of fuel assemblies to be stored in the SFP. The addition of this information is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-N-002 (Responsibilities of Shift Foreman)

Section 5.1.2 concerning the responsibility of the Shift Foreman is added to the PDTS. This section defines the responsibilities of the Shift Foreman and is consistent with 10 CFR 50.36 criteria for administrative controls. This change is acceptable.

VII-N-003 (Generic Personnel Titles for Plant Staff Members)

Section 5.1.3 concerning the use of generic titles for members of the plant staff is added to the PDTS. In most organizations, the responsibilities of plant staff members are well defined and are procedurally controlled. This is important to ensure consistent operation and, in the case of an emergency, a chain of command for decision-making. As organizations change, the actual titles for the listed positions may change, however, the responsibilities do not. This paragraph provides for the capability to change the specific title of a position without requiring a license amendment. The specific titles will be controlled in the QAP, which ensures that no change will be made without a 10 CFR Part 50.54(a) evaluation of its impact. This level of evaluation provides adequate control for this type of information. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-N-008 (Radiation Protection Qualified Individual Onsite During Fuel Handling Operations)

Section 5.2.2.d, a requirement for an individual qualified in radiation protection procedures to be onsite during fuel handling operations, is added to the PDTS. Although this is an increase in current requirements in the TS, it reflects and formalizes HBPP current practices and will have no significant effect on fuel handling operations. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-N-010 (Administrative Procedures to Limit Overtime Hours For Personnel Engaged in Functions Important to Safety)

Section 5.2.2.f, a requirement for providing administrative procedures to limit working hours of unit staff who perform functions important to safety, is added to the PDTS. This is consistent with the 10 CFR 50.36 criteria for providing administrative controls. This change is acceptable.

VII-N-011 (Shift Foreman)

Section 5.2.2.g, a requirement that the Shift Foreman be a Certified Fuel Handler, is added to the PDTS. In accordance with Section 5.1.2 of the PDTS, the Shift Foreman is responsible for the operational command function of HBPP. As such, the Shift Foreman needs to be cognizant and capable of making command decisions. To ensure that capability, the Shift Foreman is required to be a Certified Fuel Handler. This is consistent with the 10 CFR 50.36 criteria for providing administrative controls. This change is acceptable.

VII-N-031 (Safe Storage of Irradiated Fuel)

Section 5.5.1.a, establishing and maintaining procedures applicable to safe storage of irradiated fuel, as recommended in Appendix A of RG 1.33, is added to the PDTS. This statement is a summary statement that includes the intent of the specifically referenced CTS procedures in change items VII-LG-021, 22, 24, 26, 27, 28, and 29. This change is also consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-N-032 (QAP Requirements for Radiological Effluent and Environmental Monitoring)

Section 5.5.1.c, concerning establishing and maintaining procedures for the QAP requirements for radiological effluent and environmental monitoring, is added to the PDTS. This is consistent with 10 CFR 50.36 criteria on administrative controls. This change is acceptable.

VII-N-033 (Procedures)

Section 5.5.1.e, concerning establishing and maintaining procedures for all the programs in Section 5.6 of the PDTS. This change is consistent with 10 CFR Part 50.36 and is, therefore, acceptable.

VII-N-037 (Control of TS Bases)

Section 5.6.2, "Technical Specification (TS) Bases Control Program" is added to the PDTS. This program was added to properly control the Bases section of the PDTS. This change is also consistent with 10 CFR 50.36 and is, therefore, acceptable.

VII-N-045 (Occupational Radiation Exposure Report)

Section 5.7.1, "Occupational Radiation Exposure Report," which specifically defines the requirement that a tabulation shall be made on an annual basis in accordance with the requirements of 10 CFR 20.2206, is added to the PDTS. The addition of this section is consistent with the Millstone and Trojan PDTS; however, the content is specific to HBPP. Both Trojan and Millstone PDTS include this requirement to report occupational doses. In that requirement they are required to report "...according to work and job functions. This tabulation supplements the requirements of 10 CFR 20.2206." This tabulation has been performed at Trojan and Millstone while those plants were operating, and they have chosen to continue this tabulation and reporting. In the past, HBPP, as a part of Section VII.J.1, "Annual Report" of the CTS, has only reported occupational doses per the requirements of 10 CFR 20.2206. This report contains the total thermoluminescent dosimeter (TLD) exposure for each individual monitored for the previous year. HBPP proposes to continue with this same level of reporting. The justification for maintaining this level of reporting is as follows: The supplemental exposure information, as contained in the Trojan and Millstone PDTS, will not provide significantly useful information for the following reasons:

(a) The current annual report and proposed HBPP occupational exposure report includes the occupational exposure (without tabulation for work and job functions) for all individuals working in Unit 3. The Trojan and Millstone reports require the tabulation for work and job functions but only for individuals who receive greater than 100 mrem in one year. Currently on average, fewer than five individuals receive exposure greater than 100 mrem in a year at HBPP.

(b) The tabulation information for Millstone and Trojan is categorized in six groups. Exposures at HBPP generally fall within one or two of these categories. Therefore, the HBPP information would not provide data comparable to the other plants.

(c) Only estimated exposure from pocket ion chamber (PIC) dose can be used for reporting categorical exposure data. HBPP normally experiences a large disparity between PIC readings and TLD readings. In most cases, PIC readings are much higher than TLD readings by virtue of the low dose rates encountered. Low dose rates are primarily due to the decay of Cobalt-60 (approximately five half lives). Reporting the PIC readings would provide misleading data.

The Trojan and Millstone tabulation programs were already in place during plant operations. HBPP does not have such a program. Upgrading the existing HBPP program to include collection and tabulation of the additional data would require significant effort and time, yet provide little useful information. This change is consistent with 10 CFR 50.36 and is, therefore, acceptable.

Conclusion

The staff has completed its review of the PG&E application dated December 28, 2000, as supplemented on March 29, 2001, October 31, 2001 and December 21, 2001 to amend the CTS to a set of PDTS. The licensee requested NRC approval to revise and reformat the HBPP CTS to a set of PDTS partially based on NRC approval of Trojan Nuclear Plant and Millstone Unit 1 PDTS. Based on our review, we find the proposed changes to be acceptable.

Based on its review, the staff finds that the proposed relocations and changes satisfy the requirements of 10 CFR 50.36 with regard to controls required by technical specifications. The relocations and changes are also consistent with the Commission's Final Policy Statement and follow the guidance provided by AL 95-06, GL 89-01, or RG 1.33. The proposed relocations and changes are acceptable.

In addition, the staff has reviewed the draft revision to the licensee's quality assurance program, which incorporates the relocated TS requirements. Changes to these requirements will be subsequently controlled pursuant to the established regulatory change control process of 10 CFR 50.54(a). Implementation of the proposed license amendment is contingent on implementation of the revised QAP program description containing the relocated administrative control requirements.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (66 FR 471) . The amendment also relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security nor to the health and safety of the public.

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