GPU NUCLEAR

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E910-02-058
December 5, 2002

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject Saxton Nuclear Experimental Corporation (SNEC)
Operating License No., DPR-4
Docket No. 50-146
Technical Specification Change Request No 62, Rev. 1

Gentlemen,

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

TSCR No. 62 was originally submitted to the NRC via GPU Nuclear letter E910-02-014 dated April 22, 2002. NRC letter dated October 9, 2002 (TAC No. MB5029) requested that GPU Nuclear provide additional information with respect to this change request.

Attached to this letter is GPU Nuclear's response to this request for additional information (Attachment 1).

In addition due to recent organizational changes GPU Nuclear is requesting some additional changes to these Technical Specifications as described in Attachment 2.

Finally, Attachment 3 provides the revised Technical Specification pages

TSCR No. 62, Rev 1 has been reviewed pursuant to 10 CFR 50.91(a)(1). For those Technical Specification changes from the original request resulting from responses to NRC requests for additional information GPU Nuclear believes that the original analysis is still bounding For the additional changes proposed in Attachment 2 a separate analysis supporting a determination of no significant hazards has been included. Pursuant to 10 CFR 50.91(b) copies of this TSCR revision have been provided to the designated representatives of the Commonwealth of Pennsylvania, Bureau of Radiation Protection, as well as the chief executives of the township and county in which the facility is located.

A-001

As with the original request GPU Nuclear requests that the amendment authorizing TSCR No. 62, Rev 1 become effective upon NRC acceptance of the Final Status Survey of the lower portions of the SNEC Facility Containment Vessel. If you have any questions regarding this information please contact Mr. James Byrne at (717) 948-8461.

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

Sincerely,

Executed on: 12/04/2002

G A. Kuehn
Program Director, SNEC

Attachments: 1) Response to NRC RAI on SNEC TSCR No 62
2) Evaluation of Additional Change
3) Revised Technical Specification Changes

cc: Regional Administrator – NRC Region 1
NRC Project Manager, NRR
NRC Project Scientist, Region 1
Chairman, Board of Supervisors, Liberty Township
Chairman, Board of County Commissioners, Bedford County
Director, Bureau of Radiation Protection, PA Department of Environmental Protection

Attachment 1
Response to NRC RAI on TSCR No. 62

Response to NRC RAI on SNEC TSCR No. 62 to Allow CV Dome Removal:

Question 1.

"The purpose of applying the concept of exclusion area to the site was to provide security and control access to portions of the SNEF where radioactive material was located. Will portions of the SNEF be maintained as restricted or controlled areas as defined in 10 CFR Part 20 after approval of your proposed license amendment? If restricted areas will exist, and given your proposed removal from the TS of requirements on securing the exclusion area, please explain how you will limit access for the purpose of protecting individuals against undue risks from exposure to radiation and radioactive materials. Will licensed materials be located in controlled or restricted areas? If so, please explain how the requirements of 10 CFR Part 20, Subpart I will be met."

Response:

For SNEC, the term "restricted area" applies to any area at or within the Site Boundary (as defined in TS 1.0.15) for the purposes of protection of individuals from exposure to radiation and radioactive materials, including radioactive effluents. Exposure of persons to radiation or to radioactive material will be under the supervision of the Radiation Safety Officer (RSO) as defined in TS 3.1.4. Portions of the site, within the restricted area, will be maintained as controlled areas for purposes of controlling radiation exposures and storage of licensed radioactive material. While in storage licensed radioactive materials, e.g. sealed sources, samples for analyses and low-level dry active waste will be secured from unauthorized removal through the use of locked barricades (fences) or buildings (e.g. DSB or trailers) and postings. Licensed radioactive material that is not in storage shall be controlled and maintained under constant surveillance by trained individuals authorized by the RSO.

Question 2.

"The purpose of the DSF was to facilitate the decommissioning process and allow the preparation and packaging of radioactive material for shipping. To allow removal of the CV dome, your application stated that part of the DSF would need to be removed. Where will packaging of radioactive material be carried out after removal of the DSF? Also, when activities involving radioactive waste are conducted in the DSB, the requirements of TS 2.1.1 apply, as applicable. Will any activities involving radioactive waste after issuance of this amendment have the potential to have a measurable release as defined by the TS? If so, what ventilation requirements will apply? Please add these ventilation requirements to the TSs or justify not needing the requirements."

Response:

Following removal of the DSF, the site radwaste packaging requirements will be minimal and will be consistent with those currently and historically conducted on site outside the DSF in the yard area or other temporary facilities. This would include the packaging of sealed sources, samples for analysis and low-level dry active waste (DAW). Such materials are currently packaged outside the DSF, as appropriate. Given the level of radioactivity, this practice will continue following removal of the DSF. The DSF will not be removed until activities involving the packaging of radioactive materials that could cause a measurable release as defined in the TS have been completed. As such, no ventilation requirements dictated by the TS including TS

2.1.1 will apply. The ODCM, SNEC Facility Radiation Protection Plan, 10 CFR Part 20 and OSHA regulations will continue to apply and may require the use of local ventilation in some cases such as ALARA considerations, prudent practice and non-radiological considerations.

Question 3.

Your TSs refer to the requirements of 10 CFR 50.59. Please review these TSs to confirm that they remain applicable or propose changes to agree with the changes made to 10 CFR 50.59.

Response:

TSs 3.5.2.5.1 and 3.5.2.5.2 have been revised to agree with the changes to 10 CFR 50.59. Specifically in the first paragraph of TS 3.2.2.5.1 10 CFR 50.59(a)(1) has been replaced by 10 CFR 50.59(c) in order to reference the correct section of 10 CFR 50.59. In the second paragraph of TS 3.2.2.5.1 and in TS 3.5.2.5.2 the term "unreviewed safety question" has been replaced with the term "require NRC approval" to reflect the revised language of 10 CFR 50.59.

Question 4.

You have proposed removing TS 1.0.2, "CV secured," from the TSs. While the definition is not directly used in the TSs, TS 3.2.1, to which you have proposed no changes, places requirements on the initial CV entry of the day which is assumed to bring the CV out of a secured status. TS 3.2.2 also discusses CV entry, however, you have proposed removing CV entry from this TS. The reason given for removing CV entry from proposed TS 3.2.2 is that with removal of the upper half of the CV, there will no longer be an entry to control. Please discuss if an inconsistency exists between TSs 3.2.1 and 3.2.2 and if an inconsistency exists, please address. While the staff agrees if the CV has been removed, there cannot be entries into the CV, will there be any control of CV entries after issuance of the proposed TSs but before CV removal begins and during CV removal?

Response:

TS 3.2.1 has been deleted in order to remove any inconsistency with TS 3.2.2. Even though 10 CFR 20 contained appropriate controls this TS was deemed necessary during the early phases of SNEC decommissioning activities as there still existed areas with significant quantities of radioactive material which may have changed and a prior survey was needed to ensure worker radiological safety. Ongoing decommissioning work has eliminated this concern. Thus, following NRC acceptance of the Final Status Survey of the lower portions of the CV, appropriate controls as required by 10 CFR 20 and TS 3.2.2 are all that are necessary to be applied to work in the CV prior to and during upper dome removal.

Question 5.

"Your proposed TS refers to the use of "appropriate ventilation" during activities involving removal of the upper half of the CV. Please clarify what you mean by appropriate ventilation and how the decision will be made that an approach to ventilation is appropriate."

Response:

Local ventilation using portable ventilation units may be employed as appropriate due to industrial hygiene requirements such as lead based paint removal, fugitive dust emissions and worker comfort. Decisions made to use ventilation in this role will be done to comply with OSHA and Company safety and health requirements and guidelines. During removal activities, appropriate ventilation may also be employed for ALARA purposes to minimize exposure to workers. Such decisions will be made in accordance with the requirements of the SNEC Facility Radiation Protection Plan and 10 CFR Part 20. During removal of the upper half of the CV, radioactive contamination levels in the areas affected by removal activities will be low enough or fixed such that a "measurable release" as defined in the TS will be minimized. Portable ventilation will be provided when cutting potentially contaminated steel and air sampling equipment will be employed to assess any radioactive release.

Question 6.

"At some point after issuance of your proposed amendment, parts of the DSF will be removed and removal of the CV dome start. At this point, the inside of the DSF and CV will be exposed to the environment. What levels of removable contamination will exist on the inside of the CV at that point? Is it possible that wind or rainfall could transport this radioactive material out of the CV? What would be the impact of this transport?"

Response:

At the point at which the CV interior will be exposed to the environment during upper dome removal activities, removable radioactive contamination levels will be reduced to meet the site free release criteria as defined in the site Radiation Protection Plan or will be fixed in place to prevent release. In either case this precludes the possibility that wind or rainfall could transport this radioactive material out of the CV such that it could have any adverse impact. In any event, additional source term analysis provided in the No Significant Hazards Consideration section in GPU Letter E910-02-014, dated April 22, 2002 which provided Technical Specification Change Request No.62 would bound any release.

Question 7.

"Please provide survey information on radiation levels on the operating floor level of the CV after backfilling and isolation activities are complete.

Response:

GPU Nuclear agrees to provide survey information on radiation levels on the "operating floor" level of the CV after backfilling and isolation activities are complete. Note that the term "operating floor" has traditionally referred to the original 818'/812' elevation concrete floor of the CV. Since all the concrete has been removed from the CV this floor is no longer in place.

Following back fill and isolation activities, a cover will be placed on top of the back fill to prevent cross contamination during removal of the upper CV dome. This cover, and any exposed portion of the CV liner, which will remain following license termination, will be included in the Final Status Survey (FSS).

Attachment 2
Evaluation of Additional Changes

I. Reason for Proposed Change

In addition to responding to the NRC Request for Additional information, recent organizational changes necessitate other minor changes to the Technical Specifications. With the merger of GPU Inc. and FirstEnergy Corp. GPU Nuclear and SNEC became FirstEnergy companies. FirstEnergy also operates nuclear facilities as FENOC. In order to align nuclear oversight functions the FENOC Vice-President of Nuclear Oversight has also become the GPU Nuclear Vice-President of Nuclear Oversight. Based on this change certain changes to the SNEC Facility Technical Specifications are appropriate.

II. Description of Change and Safety Evaluation Justifying Changes

Technical Specification 3.5.4 should be revised as follows:

3.5.4 Audits

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

This change is administrative in nature as it simply adds the Vice-President of GPU Nuclear Oversight to the list of individuals who can request audits and to who audit reports should be distributed.

Technical Specifications 3.5.5.1 and 3.5.5.4 should be revised as follows:

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

3.5.5.4 Written minutes of all meetings shall be prepared and distributed to *the Vice-President GPU Nuclear Oversight and* the GPU NUCLEAR Cognizant Officer within 30 days of the meeting date.

These changes are administrative in nature. The changes to subsection 3.5.5.1 only changes the officer responsible for the Oversight Committee it does not change any functions of the committee. The change to subsection 3.5.5.4 is similar to the changes to section 3.5.4 as it simply adds the Vice-President GPU Nuclear Oversight to the distribution of oversight committee minutes.

III. No Significant Hazards Consideration

GPU Nuclear has determined that this additional change to Technical Specification Change Request No. 62 Rev. 1 involves no significant hazards consideration as defined in 10 CFR 50.92

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

   As described above these changes are administrative in nature. As such they have no effect on the probability of occurrence or consequences of an accident or malfunction of equipment important to safety.

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

   As described above these changes are administrative in nature. As such they have no effect on the possibility of an accident or malfunction of a different type.

3. The changes will not involve a significant reduction in the margin of safety as defined in the basis for any technical specification for SNEC.

   As described above these changes are administrative in nature. As such they have no effect on the margin of safety as defined in the basis for any technical specification for SNEC.

Attachment 3
Revised Technical Specification Changes

Includes change pages 1, 3, 4, 5, 6, 9, 10, 11, 12, 13, 20

1.0 DEFINITIONS

1.0.1 CONTAINMENT VESSEL -

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

1.0.2 Deleted

1.0.3 DECOMMISSIONING ACTIVITIES -

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

1.0.4 Deleted

1.0.5 Deleted

1.0.11 PROCESS CONTROL PROGRAM (PCP) -

The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analyses, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

1.0.12 PRODUCTION ACTIVITIES -

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

These activities are a sub-set of DECOMMISSIONING ACTIVITIES.

1.0.13 RADIOACTIVE WASTE MANAGEMENT ACTIVITIES -

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

1.0.14 Deleted

1.0.15 SITE BOUNDARY -

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

1.0.16 SNEC -

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

1.0.17 SUBSTANTIVE CHANGE(S) -

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

1.0.18 UNRESTRICTED AREA -

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

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

1.1 SITE

1.1.1 Location

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

1.1.2 Deleted

1.1.3 Deleted

1.1.3.1 Deleted

1.1.3.2 Deleted
1.1.3.3 Deleted

2.0 PRINCIPAL ACTIVITIES

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

2.1 Limiting Conditions for Performing DECOMMISSIONING ACTIVITIES

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

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

2.1.3 Verification by analysis that release criteria have been satisfied is required prior to making any batch release of liquid waste process effluent. Effluent release calculations will be made in accordance with the OFFSITE DOSE CALCULATION MANUAL.

3.0 ADMINISTRATIVE CONTROLS

3.1 Organization and Responsibilities

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

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

3.1.1 The GPU NUCLEAR Cognizant Officer is responsible for and provides full-time dedicated staff for the purpose of conducting all activities safely, effectively and in accordance with corporate policies, applicable laws, regulations, licenses and Technical Specifications (TSs).

3.1.2 The Program Director SNEC Facility is responsible for administration of all SNEC facility functions, for direction of all DECOMMISSIONING ACTIVITIES, and for assuring that the requirements of License No. DPR-4 and these TSs are implemented.

3.1.3 The SNEC Facility Site Supervisor provides on-site management and continuing oversight of PRODUCTION ACTIVITIES.

3.1.4 The Radiation Safety Officer (RSO) is responsible for the conduct and oversight of all SNEC radiation safety activities through implementation of the Radiation Protection Plan. All radiological controls personnel shall have stop work authority in matters relating to or impacting radiation safety.

3.1.5 The Group Radiological Controls Supervisor (GRCS) directly supervises radiation safety activities.

3.1.6 Other GPU Inc. personnel provide SNEC facility management with technical support, project management capabilities and manpower.

3.2 Facility Staffing Requirements:

3.2.1 Deleted

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

3.5.1.10 Records of the review activities performed in accordance with 3.5.1.2 through 3.5.1.7 shall be maintained in accordance with section 3.9.

3.5.2 Independent Safety Review

3.5.2.1 The GPU NUCLEAR Cognizant Officer is responsible for ensuring the independent safety review of the subjects described in section 3.5.2.3.

3.5.2.2 Independent safety review shall be completed by an individual or group not having direct responsibility for the performance of activities under review, but who may be from the same functionally cognizant organization as the individual or group performing the original work.

3.5.2.3 GPU NUCLEAR shall collectively have or have access to the experience and competence required to independently review subjects in the following areas:

- nuclear unit operations
- electrical, mechanical and nuclear engineering
- chemistry and radiochemistry
- metallurgy
- instrumentation and control
- radiological safety
- administrative controls and quality assurance practices
- other appropriate fields such as radioactive waste management.

3.5.2.4 Consultants may be utilized as determined by the GPU NUCLEAR Cognizant Officer to provide expert advice.

3.5.2.5 The following subjects shall be independently reviewed by Independent Safety Reviewers:

3.5.2.5.1 Written safety evaluations of changes in the facility and changes of procedures described in the Safety Analysis Report, and of tests or experiments not described in the Safety Analysis Report, which are completed without prior NRC approval under the provisions of 10 CFR 50.59(c). This review is to verify that such changes, tests or

experiments did not involve a change to the TS or require NRC approval pursuant to 10 CFR 50.59. Written safety evaluations associated with the direct performance of a change, test or experiment shall be completed prior to the initiation of the activity.

3.5.2.5.2 Proposed changes in procedures, in the facility or tests or experiments, any of which involves a change in the TS or require NRC approval pursuant to 10 CFR 50.59. Matters of this kind shall be reviewed prior to their submittal to the NRC.

3.5.2.5.3 Proposed changes to TS or license amendments shall be reviewed prior to submittal to the NRC for approval.

3.5.2.5.4 Violations, deviations and reportable events which require reporting to the NRC in writing. Such reviews are performed after the fact. Review of events covered under this subsection shall include results of any investigations to prevent or reduce the probability of recurrence of the event.

3.5.2.5.5 Written summaries of audit reports identified in section 3.5.4.

3.5.2.5.6 Any other matter involving the facility which a reviewer deems appropriate for consideration or which is referred to the independent reviewers.

3.5.2.6 The Independent Safety Reviewers shall either have a Bachelors Degree in Engineering or the Physical Sciences and five years professional level experience in the area being reviewed or have nine years of appropriate experience in the field of specialty. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

3.5.2.7 Records of reviews encompassed in section 3.5.2.5 shall be maintained in accordance with section 3.9.

3.5.3 Inspection

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

a Deleted

b. Deleted

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

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

3.5.4 Audits

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

3.5.5 TMI-2/SNEC Oversight Committee

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

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

3.5.5.3 Meetings shall be held at least three times per year.

3.5.5.4 Written minutes of all meetings shall be prepared and distributed to the Vice-President GPU Nuclear Oversight and the GPU NUCLEAR Cognizant Officer within 30 days of the meeting date.

3.6 Procedures, Programs and Manuals

3.6.1 Procedures

3.6.1.1 Activities which are designated as within the scope of the SNEC facility's Quality Assurance Program shall be prescribed by written, reviewed and approved procedures of a type appropriate to the circumstances.

3.6.1.2 Written procedures shall be established, implemented and maintained for the activities listed below:

3.6.1.2.1 Characterization, decommissioning and maintenance activities determined to be within the scope of the QA program.

3.6.1.2.2 Access control, emergency actions (including fire protection program implementation), facility inspections and audits.

3.6.1.2.3 Radiological exposure control, survey activities and radwaste shipping and handling.

3.6.1.2.4 Activities which could result in a MEASURABLE RELEASE to the environment.

3.6.1.3 These procedures shall require that the following actions be taken:

3.6.1.3.1 All DECOMMISSIONING ACTIVITIES and maintenance work under Health Physics control shall be consistent with 10 CFR Part 20 requirements to minimize the radiation exposure of personnel and to prevent the release of radioactivity in excess of allowable limits to the environment.

3.6.1.3.2 All radiation surveys, tests, counting work, radiation exposure control measures and all other work performed in radiologically controlled areas shall conform with the requirements of the Radiation Protection Plan.

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

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

3.6.2 Programs

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

3.6.2.1 Radioactive Effluent Controls Program

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

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

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

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

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

FIGURE 1
SAXTON NUCLEAR EXPERIMENTAL CORP. FACILITY LAYOUT

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