



An Exelon/British Energy Company



Nuclear

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November 27, 2002

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Peach Bottom Atomic Power Station, Units 2 and 3
Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket No. 50-254 and 50-265

Oyster Creek Generating Station
Facility Operating License No. DPR-16
NRC Docket No. 50-219

Subject: Request for Technical Specifications Change to Eliminate Requirements for Post Accident Sampling System Using the Consolidated Line Item Improvement Process

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (Exelon), LLC, and AmerGen Energy Company (AmerGen), LLC propose changes to Appendix A, Technical Specifications (TS), of the Facility Operating Licenses listed above. The proposed change deletes the TS section, "Post Accident Sampling," and thereby eliminates the requirement to have and maintain the Post Accident Sampling System (PASS) at the above stations. The change is consistent with NRC approved Industry/TS Task Force (TSTF) Standard TS Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement was announced in the Federal Register, Volume 67, Number 54, "Notice of Model Application Concerning Technical Specification Improvement To Eliminate Post Accident Sampling Requirements for Boiling Water Reactors Using the Consolidated Line Item Improvement Process," Pages 13027-13029, on March 20, 2002.

These proposed changes have been reviewed by the Plant Operations Review Committees at each of the stations and approved by the Nuclear Safety Review Board.

A001

We are notifying the States of Illinois, Pennsylvania, and New Jersey of this application for changes to the TS and Operating License by transmitting a copy of this letter and its attachments to the designated state official.

This information is being submitted under unsworn declaration.

This proposed amendment request is subdivided as follows.

1. Attachment A provides a description of the proposed change, the requested confirmation of applicability of the model safety evaluation (SE) and no significant hazards consideration (NSHC) determination, Environmental Evaluation, and plant-specific verifications.
2. Attachments B-1 through B-7 include the marked-up TS pages with the requested changes indicated.
3. Attachment C provides a summary of the licensing commitments made in this submittal.

We request approval of the proposed change by November 27, 2003, with the amendment being implemented within 180 days of issuance.

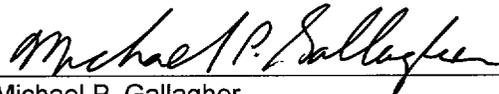
If you have any questions or require additional information, please contact me at (610) 765 - 5664.

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

Respectfully,

Executed on

11-26-02



Michael P. Gallagher
Director, Licensing and Regulatory Affairs
Mid-Atlantic Regional Operating Group

Attachments: A: Description and Assessment
 B: Marked-Up TS Pages
 C: List of Commitments

cc: Regional Administrator - NRC Region I
 Regional Administrator - NRC Region III
 NRC Senior Resident Inspector – Clinton Power Station
 NRC Senior Resident Inspector – Dresden Nuclear Power Station
 NRC Senior Resident Inspector – LaSalle County Station
 NRC Senior Resident Inspector – Limerick Generating Station
 NRC Senior Resident Inspector – Peach Bottom Atomic Power Station
 NRC Senior Resident Inspector – Quad Cities Nuclear Power Station
 NRC Senior Resident Inspector – Oyster Creek Generating Station
 NRC Project Manager – Clinton Power Station
 NRC Project Manager – Dresden Nuclear Power Station
 NRC Project Manager – LaSalle County Station
 NRC Project Manager – Limerick Generating Station
 NRC Project Manager – Peach Bottom Atomic Power Station
 NRC Project Manager – Quad Cities Nuclear Power Station
 NRC Project Manager – Oyster Creek Generating Station
 Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety
 R. R. Janati, Commonwealth of Pennsylvania
 K. Tosch, New Jersey Bureau of Nuclear Engineering, Department of Environmental Protection
 Mayor of Lacey Township, New Jersey

ATTACHMENT A

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (Exelon), LLC, and AmerGen Energy (AmerGen) Company, LLC propose changes to Appendix A, Technical Specifications (TS), for the following Operating Licenses.

Exelon

Dresden Nuclear Power Station, Units 2 and 3	Facility Operating License Nos. DPR-19 and DPR-25
LaSalle County Station, Units 1 and 2	Facility Operating License Nos. NPF-11 and NPF-18
Limerick Generating Station, Units 1 and 2	Facility Operating License Nos. NPF-39 and NPF-85
Peach Bottom Atomic Power Station, Units 2 and 3	Facility Operating License Nos. DPR-44 and DPR-56
Quad Cities Nuclear Power Station, Units 1 and 2	Facility Operating License Nos. DPR-29 and DPR-30

AmerGen

Clinton Power Station, Unit 1	Facility Operating License No. NPF-62
Oyster Creek Generating Station	Facility Operating License No. DPR-16

The proposed change deletes the TS section titled "Post Accident Sampling" and thereby eliminates the requirement to have and maintain the Post Accident Sampling System (PASS) at the above stations.

2.0 DESCRIPTION

The proposed change deletes the TS section titled "Post Accident Sampling." The change is consistent with NRC approved Industry/TS Task Force (TSTF) Standard TS Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)" (Reference 1). This TS improvement was announced in the Federal Register, Volume 66, Number 248, "Notice of Opportunity To Comment on Model Safety Evaluation on Technical Specification Improvement To Eliminate Post Accident Sampling Requirements for Boiling Water Reactors Using the Consolidated Line Item Improvement Process," Pages 66949-66954, on December 27, 2001 (Reference 2). The availability of this TS improvement was announced in the Federal Register, Volume 67, Number 54, "Notice of Model Application Concerning Technical Specification Improvement To Eliminate Post Accident Sampling

Requirements for Boiling Water Reactors Using the Consolidated Line Item Improvement Process," Pages 13027-13029, on March 20, 2002 (Reference 4). The proposed changes are indicated in Attachments B-1 through B-7.

The proposed TS changes affect the TS Bases for Oyster Creek Generating Station. Attachment B-5 contains the marked-up TS Bases pages for Oyster Creek Generating Station.

3.0 BACKGROUND

Boiling Water Reactors Owners Group (BWROG) topical report NEDO-32991-A, "Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," dated August 2001 (Reference 3), evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. NEDO-32991-A concluded that the current PASS sampling requirements specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," dated November 1980, may be eliminated.

4.0 TECHNICAL ANALYSIS

4.1 Applicability of Published Safety Evaluation

Exelon and AmerGen have reviewed the model safety evaluation (SE) published as part of the consolidated line item improvement process (CLIIP) on December 27, 2001 as revised on March 20, 2002. This verification included a review of the NRC's evaluation as well as the information provided to support TSTF-413. This supporting information was provided in NEDO-32991-A (Reference 3). We have concluded that the information presented in the TSTF proposal, the supporting information, and the SE prepared by the NRC is applicable to the subject stations and that this information supports approval of the proposed changes for the subject stations.

4.2 Optional Changes and Variations

Exelon and AmerGen are not proposing any variations or deviations from the TS changes described in TSTF-413 or the NRC's model SE published on December 27, 2001 as revised on March 20, 2002. However, additional, optional changes are necessary as described below:

1. The Limerick Units 1 & 2, LaSalle Units 1 & 2, Dresden Units 2 & 3, Quad Cities Units 1 & 2, and Clinton TS currently include an administrative requirement for a program, "Primary Coolant Sources Outside Containment," to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a transient or accident. At these plants, the PASS falls under the scope of this requirement. As described in the staff's model safety evaluation, a modification might be implemented such that the PASS would not be a potential leakage path outside containment. Since the modification, if implemented, may not be completed during the implementation period for this amendment, the TS for the Primary Coolant Sources Outside Containment program is being revised to add a parenthetical phrase following the associated listing for PASS. This phrase would state that the TS requirements would continue to apply until "such time as a modification eliminates the

PASS penetration as a potential leakage path.” This change provides clarification of the intent that the programmatic requirements of the Primary Coolant Sources Outside Containment program will continue to apply until PASS is eliminated as a potential leakage path.

2. The elimination of PASS does result in a change to the Oyster Creek TS Bases for “Accident Monitoring Instrumentation.” The proposed wording change revises the discussion to remove references to the PASS.
3. The NRC Safety Evaluation for PASS Elimination (Reference 2) states that the basis for eliminating containment hydrogen sampling is in conformance with 10CFR50.44(b)(1), Reg. Guide 1.97, and NUREG 0737 Item II.F.1. These documents require hydrogen monitoring of containment including both the drywell and torus atmospheres. At Oyster Creek, the torus air space is not monitored for hydrogen. Via NRC Safety Evaluations dated 9/29/83 and 11/18/92 (references 5 and 6, respectively), the NRC approved Oyster Creek’s methods of complying with 10CFR50.44 and NUREG 0737 Item II.F.1. Regulatory Guide (RG) 1.97, section D “Implementation” states that plants should meet the RG except as modified by NUREG 0737. The containment hydrogen monitors at OC were accepted via NRC Safety Evaluation as stated above, therefore the guidance in Reg. Guide 1.97 with regard to containment hydrogen monitoring is satisfied.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

Exelon and AmerGen have reviewed the proposed no significant hazards consideration (NSHC) determination published as part of the CLIIP on December 27, 2001 and updated on March 20, 2002. We have concluded that the proposed determination presented in the notice is applicable to the subject stations and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a), “Notice for public comment.”

5.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register (Reference 2) for this TS improvement, plant-specific verifications were performed as follows.

1. Exelon and AmerGen will maintain or develop contingency plans for obtaining and analyzing highly radioactive samples of the reactor coolant, suppression pool, and containment atmosphere. The contingency plans will be contained in the subject station’s chemistry procedures and implemented with the implementation of the license amendment. Establishment of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold will be established at a level of core damage associated with radioactivity levels of 300 micro-curies/gm dose equivalent iodine in the primary coolant system. This capability will be described in our emergency plans and emergency plan implementing procedures and implemented with the implementation of the license amendment. The capability for classifying fuel damage events is considered a regulatory commitment.

3. Exelon and AmerGen have established the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in our emergency plans and emergency plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

6.0 ENVIRONMENTAL EVALUATION

Exelon and AmerGen have reviewed the environmental evaluation included in the model SE published as part of the CLIP on October 31, 2000. We have determined that the NRC's findings presented in that evaluation are applicable to the subject stations and the evaluation is hereby incorporated by reference for this application.

7.0 REFERENCES

1. Industry/Technical Specifications Task Force Standard Technical Specification Change Traveler TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)."
2. Federal Register, Volume 66, Number 248, "Notice of Opportunity To Comment on Model Safety Evaluation on Technical Specification Improvement To Eliminate Post Accident Sampling Requirements for Boiling Water Reactors Using the Consolidated Line Item Improvement Process," Pages 66949-66954, on December 27, 2001.
3. Boiling Water Reactors Owners Group (BWROG) topical report NEDO-32991-A, "Regulatory Relaxation for BWR Post Accident Sampling System (PASS)," dated August 2001.
4. Federal Register, Volume 67, Number 54, "Notice of Availability of Model Application Concerning Technical Specification Improvement To Eliminate Post Accident Sampling Requirements for Boiling Water Reactors Using the Consolidated Line Item Improvement Process," Pages 13027-13029, on March 20, 2002.
5. NRC Safety Evaluation, letter from US NRC to Mr. P. B. Fiedler, dated 9/29/83.
6. NRC Safety Evaluation, letter from US NRC to Dr. R. L. Long, dated 11/18/92.

ATTACHMENT B-1

**MARKED-UP TS PAGE FOR PROPOSED CHANGE
Clinton Power Station**

TS PAGE

5.0-8

5.0-9

INSERT 1

(until such time as a modification eliminates the PASS penetration as a potential leakage path)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the:

- a. LPCS System;
- b. HPCS System;
- c. RHR System;
- d. RCIC System;
- e. Suppression Pool Makeup System;
- f. Combustible Gas Control System;
- g. Containment Monitoring System; and
- h. Post-accident Sampling System.

INSERT 1

The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

(continued)

5.5 Programs and Manuals (continued)

5.5.3 Post Accident Sampling

Deleted

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;

(continued)

ATTACHMENT B-2

**MARKED-UP TS PAGE FOR PROPOSED CHANGE
Dresden Nuclear Power Station, Units 2 and 3**

TS PAGE

5.5-2

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(until such time as a modification eliminates the PASS penetration as a potential leakage path)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Low Pressure Coolant Injection, Isolation Condenser, Shutdown Cooling, Reactor Water Cleanup, process sampling, containment monitoring, and Standby Gas Treatment. The program shall include the following:

INSERT 1

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at 24 month intervals.

The provisions of SR 3.0.2 are applicable to the 24 month frequency for performing integrated system leak test activities.

5.5.3 Post Accident Sampling

Deleted.

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

(continued)

ATTACHMENT B-3

**MARKED-UP TS PAGE FOR PROPOSED CHANGE
LaSalle County Station, Units 1 and 2**

TS PAGE

5.5-2

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(until such time as a modification eliminates the PASS penetration as a potential leakage path)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Low Pressure Core Spray, High Pressure Core Spray, Residual Heat Removal/Low Pressure Coolant Injection, Reactor Core Isolation Cooling, hydrogen recombiner, process sampling, containment monitoring and Standby Gas Treatment. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at 24 month intervals.

INSERT 1

The provisions of SR 3.0.2 are applicable to the 24 month frequency for performing integrated system leak test activities.

5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

(continued)

ATTACHMENT B-4

**MARKED-UP TS and BASES PAGES FOR PROPOSED CHANGE
Limerick Generating Station, Units 1 and 2**

TS PAGES

6-14 (Unit 1)

6-14 (Unit 2)

INSERT 1

(until such time as a modification eliminates the PASS system as a potential leakage path)

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

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

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the core spray, high pressure coolant injection, reactor core isolation cooling, residual heat removal, post-accident sampling system, safeguard piping fill system, control rod drive scram discharge system, and containment air monitor systems. The program shall include the following:

INSERT 1

1. Preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

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1. Training of personnel,
2. Procedures for sampling and analysis, and
3. Provisions for maintenance of sampling and analysis equipment.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

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

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the core spray, high pressure coolant injection, reactor core isolation cooling, residual heat removal, post-accident sampling system, safeguard piping fill system, control rod drive scram discharge system, and containment air monitor systems. The program shall include the following:

INSERT 1

1. Preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1. Training of personnel,
2. Procedures for sampling and analysis, and
3. Provisions for maintenance of sampling and analysis equipment.

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ATTACHMENT B-5

**MARKED-UP TS PAGES FOR PROPOSED CHANGE
Oyster Creek Generating Station**

TS PAGES

3.13-4

6-20

As the safety valves present distinctly different concerns than those related to relief valves, the technical specifications are separated as to the actions taken upon inoperability. Clearly, the actuation of a safety valve will be immediately detectable by observed increase in drywell pressure. Further confirmation can be gained by observing reactor pressure and water level. Operator action in response to these symptoms would be taken regardless of the acoustic monitoring system status. Acoustic monitors act only to confirm the reseating of the safety valve. In actuality, the operator actions in response to the lifting of a safety valve will not change whether or not the safety valve reseats. Therefore, the actions taken for inoperable acoustic monitors on safety valves are significantly less stringent than that taken for those monitors associated with relief valves.

Should an acoustic monitor on a safety valve become inoperable, the setpoint on an adjacent monitor, if operable, will be reduced to assure alarm actuation should the safety valve lift. When a reduced setpoint results in having the acoustic monitor on an adjacent valve in an alarm condition due to background noise, the setpoint may be returned to normal. This will ensure that the adjacent valve's acoustic monitor remains operable. Analyses, using very conservative blowdown forces and attenuation factors, show that reducing the alarm setpoint on adjacent monitors to less than 1.4g will assure alarm actuation should the adjacent safety valve lift. Minimum blowdown force considered was 30g with a maximum attenuation of 27dB. In actuality, a safety valve lift would result in considerably larger blowdown force. The maximum attenuation of 27dB was determined based on actual testing of a similar monitoring system installed in a similar configuration.

The operability of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables during and following an accident. The capability is consistent with NUREGs 0578 and 0737.

The capability is provided to detect and measure concentrations of noble gas fission products in (1) plant gaseous effluents and (2) in containment during and following an accident. For the plant gaseous effluent capability, two Radioactive Gaseous Effluent Monitoring Systems (RAGEMS) are installed at Oyster Creek. One system monitors releases at the main stack (RAGEMS I) and the other monitors the turbine building vents (RAGEMS II). For the in containment post-accident capability, two high range radiation monitors are installed in the drywell. These monitors augment the capabilities provided by ~~the Post Accident Sampling System (Technical Specification 6.17 and FSAR Section 11.5) and the Offsite Thermoluminescent Dosimeter Program (Emergency Plan Section 7.5.2.2b).~~ ~~The Post Accident Sampling System represents a preplanned alternate method to the high range radiation monitors capable of being implemented to provide an estimate of radioactive material in containment under accident conditions.~~

delete

6.17 POST-ACCIDENT SAMPLING

The following program shall be established, implemented, and maintained.

A program has been established which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel in sampling and analysis.
- b. Procedures for sampling and analysis.
- c. Provisions for verifying operability of the System.

6.18 PROCESS CONTROL PLAN

- a. Licensee initiated changes to the PCP:
 - 1. Shall be submitted to the NRC in the Annual Radioactive Effluent Release Report for the period in which the changes were made. This submittal shall contain:
 - a. sufficiently detailed information to justify the changes without benefit of additional or supplemental information;
 - b. a determination that the changes did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - c. documentation that the changes have been reviewed and approved pursuant to Section 6.8.2.
 - 2. Shall become effective upon review and approval by licensee management.

6.19 OFFSITE DOSE CALCULATION MANUAL

- a. The ODCM shall be approved by the Commission prior to implementation.
- b. Licensee initiated changes to the ODCM shall be submitted to the NRC in the Annual Radioactive Effluent Release Report for the period in which the changes were made. This submittal shall contain:
 - 1. sufficiently detailed information to justify the changes without benefit of additional or supplemental information;
 - 2. a determination that the changes did not reduce the accuracy or reliability of dose calculations or setpoint determination; and,
 - 3. documentation that the changes have been reviewed and approved pursuant to Section 6.8.2.
- c. Change(s) shall become effective upon review and approval by licensee management.

ATTACHMENT B-6

**MARKED-UP TS PAGES FOR PROPOSED CHANGE
Peach Bottom Atomic Power Station, Units 2 and 3**

TS PAGES

5.0-8 (Unit 2)

5.0-8 (Unit 3)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, and Reactor Water Cleanup. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. System leak test requirements for each system, to the extent permitted by system design and radiological conditions, at refueling cycle intervals or less.

5.5.3 Post Accident Sampling

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions and radioactive iodine and particulates in plant gaseous effluents under accident conditions. The program shall include the following:~~

- ~~a. Training of personnel;~~
- ~~b. Procedures for sampling and analysis; and~~
- ~~c. Provisions for maintenance of sampling and analysis equipment.~~

Deleted.

(continued)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, and Reactor Water Cleanup. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. System leak test requirements for each system, to the extent permitted by system design and radiological conditions, at refueling cycle intervals or less.

5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions and radioactive iodine and particulates in plant gaseous effluents under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

(continued)

ATTACHMENT B-7

**MARKED-UP TS PAGE FOR PROPOSED CHANGE
Quad Cities Nuclear Power Station, Units 1 and 2**

TS PAGE

5.5-2

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(until such time as a modification eliminates the PASS penetration as a potential leakage path)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, process sampling, containment monitoring, and Standby Gas Treatment. The program shall include the following:

INSERT 1

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at 24 month intervals.

The provisions of SR 3.0.2 are applicable to the 24 month Frequency for performing integrated system leak test activities.

5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

(continued)

Deleted.

ATTACHMENT C

LIST OF COMMITMENTS

The following table identifies those actions committed to by Exelon Generation Company, LLC (Exelon) and AmerGen Energy Company (AmerGen) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments.

COMMITMENT	Due Date/Event
<p>Exelon and AmerGen will maintain or develop contingency plans for obtaining and analyzing highly radioactive samples of the reactor coolant, suppression pool, and containment atmosphere. The contingency plans will be contained in the subject station chemistry procedures and implemented with the implementation of the license amendment. Establishment of contingency plans is considered a regulatory commitment.</p>	<p>Implemented with the implementation of the license amendment</p>
<p>The capability for classifying fuel damage events at the Alert level threshold will be established at a level of core damage associated with radioactivity levels of 300 micro-curies/gm dose equivalent iodine. This capability will be described in our emergency plans and emergency plan implementing procedures and implemented with the implementation of the license amendment. The capability for classifying fuel damage events is considered a regulatory commitment.</p>	<p>Implemented with the implementation of the license amendment</p>
<p>Exelon and AmerGen have established the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in our emergency plans and emergency plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.</p>	<p>Complete, capability currently exists</p>