April 21, 2003

Mr. James A. Kay
Manager of Regulatory Affairs
Yankee Atomic Electric Company
49 Yankee Road
Rowe, MA 01367

SUBJECT: YANKEE NUCLEAR POWER STATION - ISSUANCE OF AMENDMENT NO. 157 RE: DELETION OF OPERATIONAL AND ADMINISTRATIVE REQUIREMENTS FOLLOWING FUEL TRANSFER TO ISFSI (TAC NO. L52086)

Dear Mr. Kay:

The Commission has issued the enclosed Amendment No. 157 to Possession Only License No. DPR-3 for the Yankee Nuclear Power Station. This amendment is in response to your application dated January 14, 2003.

The amendment revises the Yankee Rowe Nuclear Power Station License and Technical Specifications to delete operational and administrative requirements that would no longer be required once the spent nuclear fuel has been transferred from the spent fuel pool to the Independent Spent Fuel Storage Installation (ISFSI).

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

Sincerely,

/RA/

John B. Hickman, Project Manager
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards

Docket No. 50-29

Enclosures: 1. Amendment No. 157 to DPR-3
2. Safety Evaluation

cc w/encls: See next page

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49 Yankee Road
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YANKEE ATOMIC ELECTRIC COMPANY

DOCKET NO. 50-29

YANKEE NUCLEAR POWER STATION

AMENDMENT TO POSSESSION ONLY LICENSE

Amendment No. 157
License No. DPR-3

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

   A. The application for amendment filed by Yankee Atomic Electric Company (the licensee) dated January 14, 2003, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

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

   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 Possession Only License No. DPR-3 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 157, are hereby incorporated in the license. The licensee shall possess and maintain the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION
/RA/

Daniel M. Gillen, Chief
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards

Attachment: Changes to the Technical
Specifications

Date of Issuance:

ATTACHMENT TO LICENSE AMENDMENT NO. 157

POSSESSION ONLY LICENSE NO. DPR-3

DOCKET NO. 50-29

Replace the following pages of the License and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE	INSERT
License	
3	3
5	5
Appendix A	
i through v	i through v
1-1_	1-1
1-2	-
3/4 -1 through 3/4-8	3/4-1
Bases Cover Page	Bases Cover Page
B3/4-1 through B3/4-7	-
5-1	5-1
6-1 through 6-5	6-1
6-13	-
6-16 through 6-22	-

and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is not authorized to operate the reactor. Fuel may not be placed in the reactor vessel. Amdt #142 8/5/1992

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 157, are hereby incorporated in the License. The licensee shall possess and maintain the facility in accordance with the Technical Specifications. Amdt #145 9/4/1992

(3) Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revision to 10 CFR 73.55 (51 FR 27817 and 17822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan, which contain Safeguards Information protected under 10 CFR 73.21, is entitled, "Yankee Nuclear Power Station Security Plan," which includes the "Contingency Plan" and the "Guard Training and Qualification Plan," with revisions submitted through June 28, 2001. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein. Amdt. #156 3/13/2002

(4) Fire Protection

The licensee shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for the facility and as approved by NRC Safety Evaluation Reports dated March 15, 1979, and as supplemented October 1, 1980, and August 27, 1986, subject to the following provisions: Amdt. #144 8/20/1992

The licensee may make changes to the approved Fire Protection Program without prior NRC approval if these changes do not reduce the effectiveness of fire protection for facilities, systems, and equipment which could result in a radiological hazard, taking into account the decommissioning plant conditions and activities. Amdt. #157 4/17/2003

D. This license is effective as of the date of issuance and authorizes ownership and possession of this facility until the Commission notifies the licensee in writing that the license is terminated. The licensee shall:

1. Take actions necessary to decommission and decontaminate this facility and continue to maintain this facility, including, where applicable, the storage, control and maintenance of the spent fuel, in a safe condition; and

2. Conduct activities in accordance with all other restrictions applicable to this facility in accordance with NRC regulations and the specific provisions of this 10 CFR 50 facility license.

Amdt. #157
4/17/2003

FOR THE NUCLEAR REGULATORY COMMISSION

Bruce A. Boger, Director
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Date of Issuance: August 5, 1992

INDEX

DEFINITIONS

INDEX

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCES

BASES

INDEX

DESIGN FEATURES

INDEX

ADMINISTRATIVE CONTROLS

INDEX

ADMINISTRATIVE CONTROLS (continued)

This section is not applicable to a facility with all of the spent nuclear fuel stored at an Independent Spent Fuel Storage Installation (ISFSI).

(Page 1-2 has been deleted)

This section is not applicable to a facility with all of the spent nuclear fuel stored at an Independent Spent Fuel Storage Installation (ISFSI).

(Pages 3/4-2 through 3/4-8 have been deleted)

BASES FOR

LIMITING CONDITIONS FOR OPERATION

AND

SURVEILLANCE REQUIREMENTS

FOR THE

DEFUELED TECHNICAL SPECIFICATIONS

(Pages B3/4-1 through B3/4-7 have been deleted)

5.0 DESIGN FEATURES

5.1 SITE LOCATION

The Yankee Nuclear Power Station is located in the town of Rowe, Massachusetts, three-quarters of a mile south of the Vermont-Massachusetts border as shown in Figure 300-1 of the updated Final Safety Analysis Report

5.2 FUEL STORAGE

A maximum of 540 spent fuel assemblies from the Yankee Nuclear Power Station are stored in dry casks within an Independent Spent Fuel Storage Installation (ISFSI).

This section is not applicable to a facility with all of the spent nuclear fuel stored at an Independent Spent Fuel Storage Installation (ISFSI).

(Pages 6-2 through 6-22 have been deleted)

SAFETY EVALUATION

BY THE OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

RELATED TO AMENDMENT NO. 157 TO POSSESSION ONLY LICENSE NO. DPR-3

YANKEE ATOMIC ELECTRIC COMPANY

YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-29

1.0 INTRODUCTION

By application dated January 14, 2003, the Yankee Atomic Electric Company (YAEC or licensee) requested changes to the Yankee Nuclear Power Station (Rowe) Technical Specifications (TSs). The proposed changes would delete operational and administrative requirements that would no longer be required once the spent nuclear fuel has been transferred from the spent fuel pool to the Independent Spent Fuel Storage Installation (ISFSI).

2.0 BACKGROUND

The plant was permanently shut down on October 1, 1991. By February 14, 1992, YAEC had moved the fuel from the reactor vessel to the spent fuel pool. By letter dated February 27, 1992, the licensee informed the NRC that the plant was permanently shut down and that decommissioning would commence. YAEC submitted a decommission plan on December 20, 1993, which included an environmental report. The decommissioning plan was approved by Order on February 14, 1995, and the plant is undergoing dismantlement under 10 CFR 50.59. The licensee has completed construction of an on-site ISFSI under a general license. Transfer of the spent nuclear fuel from the spent fuel pool to the ISFSI began in June 2002 and is expected to be completed mid-2003. At the end of the fuel transfer process, all of the spent fuel will be stored at the ISFSI.

Section 182a of the Atomic Energy Act requires applicants for nuclear power plant operating licenses to include TS as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCO); (3) surveillance requirements; (4) design features; and (5) administrative controls. The regulation, however, does not specify particular items to be included in TS.

Section 50.36(c)(2) provides four criteria to be used in determining whether particular items are required to be included in the TS. While the four criteria apply specifically to LCOs, in adopting the revision to the rule, the Commission indicated that the intent of these criteria can be used to identify the optimum set of TS administrative controls.

Addressing administrative controls, 10 CFR 50.36(c)(5) states that they "are the provisions relating to organization and management, procedures, record keeping, 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 10 CFR 50.36(c)(5), and that are not otherwise necessary to obviate the possibility of abnormal situation or event giving rise to an immediate threat to the public health and safety, may be relocated to more appropriate documents (e.g., Quality Assurance (QA) Program, Security Plan, or Emergency Plan), 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.

The QA program is a logical candidate for relocations of administrative controls due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existing NRC-approved QA plans and commitments to industry QA standards, and the established QA program change control process of 10 CFR 50.54(a).

NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," provides guidance to licensees requesting amendments that relocate administrative controls to NRC-approved QA program descriptions, where subsequent changes are controlled pursuant to 10 CFR 50.54(a). AL 95-06 provides specific guidance in the areas of: (1) independent safety engineering group, (2) reviews and audits, (3) procedure review process, and (4) records and record retention.

Some relocations are specifically discussed in AL 95-06, while others are similar in nature. Relocations not specifically discussed in AL 95-06 are evaluated with respect to the appropriateness of the relocation. Editorial changes are allowed without basis by 10 CFR 50.54(a)(3) and are not explicitly evaluated.

3.0 EVALUATION

The licensee is currently in the process of transferring all the spent nuclear fuel from the spent fuel pit (spent fuel pool) to a generally licensed ISFSI. After all the spent nuclear fuel has been transferred from the spent fuel pit to the ISFSI, many of the requirements in the license or technical specifications are inapplicable or are no longer appropriate. The licensee has proposed multiple changes to the license and technical specifications to reflect the change in status of spent fuel storage. Each of the proposed changes is evaluated below based on the premise that the changes will not take effect until after all the spent nuclear fuel has been transferred to the ISFSI.

3.1 License Changes

Currently, the second paragraph of License Condition 2.C.(4), reads: “The licensee may make changes to the approved Fire Protection Program without prior NRC approval only if those changes would not adversely affect the ability to maintain the fuel in the Spent Fuel Pit in a safe

condition in the event of a fire." With the transfer of all the spent nuclear fuel from the spent fuel pool to the ISFSI, this portion of the license condition is clearly inapplicable. The licensee has proposed to revise the second paragraph of License Condition 2.C.(4), to read: "The licensee may make changes to the approved Fire Protection Program without prior NRC approval if these changes do not reduce the effectiveness of fire protection for facilities, systems, and equipment which could result in a radiological hazard, taking into account the decommissioning plant conditions and activities." This revised wording accomplishes the intent of the license condition, to provide criteria for changes to the fire protection plan prior to NRC approval that are appropriate to the changed status of the spent nuclear fuel at the facility. Therefore, the proposed change is acceptable.

Currently, License Condition 2.D, reads: "This amended license is effective as of the date of issuance and shall expire at midnight, July 9, 2000." This license condition originally was written for the issuance of the operating license which only authorized operation of the facility for a given period of time. However, the license to operate the facility previously was rescinded by amendment no. 142, issued on August 5, 1992, and pursuant to 10 CFR 50.51(b), "Each license for a facility that has permanently ceased operations continues in effect beyond the expiration date to authorize ownership and possession of the production or utilization facility, until the Commission notifies the licensee in writing that the license is terminated." The proposed revision to the license condition authorizes possession of the facility, requires the facility be maintained in a safe condition, and requires that activities be conducted in conformance with NRC regulations and the facility license until the license is terminated by the Commission. This proposed license condition is appropriate to and consistent with the permanently shutdown condition of the facility, and therefore, is acceptable.

3.2 Technical Specification Changes

Section 1.0, "Definitions," currently contains the definitions for the terms Action, Channel Calibration, Channel Check, Channel Functional Test, Member(s) of the Public, Off-Site Dose Calculation Manual (ODCM), Operable - Operability, Process Control Program (PCP), and Reportable Event. The licensee has proposed to delete all the definitions as unnecessary. As discussed later in this safety evaluation (SE), with the removal of all spent nuclear fuel from the spent fuel pool, all LCOs will be removed from the technical specifications. With the removal of all LCOs, the definitions for Action, Channel Calibration, Channel Check, Channel Functional Test, and Operable - Operability no longer have application to the technical specifications. Therefore the deletion of the definitions for Action, Channel Calibration, Channel Check, Channel Functional Test, and Operable - Operability, is acceptable. The terms Member(s) of the Public and Reportable Event are already defined in the Code of Federal Regulations, and their redefinition in the technical specifications is unnecessarily redundant. Therefore, the deletion of the definitions for Member(s) of the Public and Reportable Event is acceptable. Also discussed later in this SE, the portions of the Administrative Controls section addressing the ODCM and the PCP are being relocated to the Yankee Decommissioning Quality Assurance Program (YDQAP). The definitions of ODCM and PCP will be adequately addressed in the YDQAP. Therefore, the proposed deletion of the definitions for Off-Site Dose Calculation Manual (ODCM) and Process Control Program (PCP) is acceptable.

TS LCOs 3.0.1, 3.0.2, and 3.0.3 currently provide basic direction for the implementation of the LCO and Actions requirements of the technical specifications. The licensee has proposed to delete these TS LCOs. As discussed subsequently in this SE, with the removal of all spent

nuclear fuel from the spent fuel pool, all LCOs and Action statements will be removed from the technical specifications. With the deletion of all LCOs and Action statements, TSs 3.0.1, 3.0.2, and 3.0.3 are no longer required, and their deletion is, therefore, acceptable.

TS Surveillance Requirement 4.0.1, 4.0.2, 4.0.3, and 4.0.4 currently specifies the applicability, performance interval, and compliance requirements with the LCOs, for the surveillance requirements in the technical specifications. The licensee has proposed to delete these surveillance requirements. As discussed subsequently in this SE, with the removal of all spent nuclear fuel from the spent fuel pool, all Surveillance Requirements will be removed from the technical specifications. With the deletion of all Surveillance Requirements, TSs 4.0.1, 4.0.2, 4.0.3, and 4.0.4 are no longer required, and therefore, their deletion is acceptable.

TS 3/4.1, “Spent Fuel Pit Water Level,” currently provides the LCOs and surveillance requirements related to the water level in the spent fuel pit. The TS details requirements for water level over the top of spent fuel stored or being moved in the spent fuel pit and monitoring requirements for that water level. The basis for this specification is to ensure that sufficient water depth is available to remove 98% of the approximately 30% iodine gap activity release for the rupture of an irradiated fuel assembly and to ensure that the exposure to personnel in the spent fuel pit area during fuel movements will be maintained as low as reasonably achievable. To support this basis, the Applicability statement in this TS states: “Whenever irradiated fuel assemblies are in the spent fuel pit.” The licensee has proposed to delete this TS following the transfer of all spent nuclear fuel from the spent fuel pit to the ISFSI. With the completion of the transfer of all the spent nuclear fuel, the requirements of TS 3/4.1 are clearly no longer applicable. Therefore, the proposed deletion of this TS is acceptable.

TS 3/4.2, “Crane Travel - Spent Fuel Pit,” currently provides the LCOs and surveillance requirements related to the use of the crane to transport heavy loads over the spent fuel pit. The basis for this specification is to ensure that in the event a heavy load is dropped over fuel assemblies the activity released will be limited and that any distortion of the fuel will not result in a critical array. To support this basis, the Applicability statement in this TS states:”With fuel assemblies in the Spent Fuel Pit.” The licensee has proposed to delete this TS following the transfer of all spent nuclear fuel from the spent fuel pit to the ISFSI. With the completion of the transfer of all the spent nuclear fuel, the requirements of TS 3/4.2, are clearly no longer applicable. Therefore, the proposed deletion of this TS is acceptable.

TS 3/4.3, “Spent Fuel Storage Area Radiation Monitor,” currently provides the LCOs and surveillance requirements related to the area radiation monitor in the spent fuel pit area. The basis for this specification is to protect plant personnel and ensure public health and safety when irradiated fuel assemblies, control rods, and sources in the spent fuel pit are moved. To support this basis, the Applicability statement in this TS states: ”When handling irradiated fuel, control rods or sources.” The licensee has proposed to delete this TS following the transfer of all spent nuclear fuel from the spent fuel pit to the ISFSI. With the completion of the transfer of all the spent nuclear fuel, the requirements of TS 3/4.3 are clearly no longer applicable. Therefore, the proposed deletion of this TS is acceptable.

TS 3/4.4, “Liquid Hold-up Tanks,” currently provides the LCOs and surveillance requirements related to the quantity of radioactive material contained in an outside tank that is not surrounded by liners, dikes or walls capable of holding the tank contents, or that does not have a tank overflow connected to the liquid radwaste treatment system. The basis for this specification is to assure

that in the event of an uncontrolled release of the tanks contents, the limits of 10 CFR 20, Appendix B, Table II, Column 2, would not be exceeded. The licensee has proposed to relocate the requirements in TS 3/4.4 to the YDQAP with only minor editorial changes. The nature of the proposed relocation is consistent with those administrative requirements addressed by AL 95-06. The limits imposed by 10 CFR 20, Appendix B would still apply with respect to any releases. Based on the above, the proposed relocation of these limits on radioactive material in liquid hold-up tanks to the QA program is appropriate and acceptable.

TS 3/4.5, “Sealed Source Contamination,” currently provides LCOs and surveillance requirements related to the quantity of allowable contamination on sealed sources. The basis for this specification is to assure that leakage from by-product, source, and special nuclear material sources will not exceed 10 CFR 70.39(c) limits. The licensee has proposed to relocate the requirements in TS 3/4.5 to the YDQAP with only minor editorial changes. The nature of the proposed relocation is consistent with those administrative requirements addressed by AL 95-06. The limits imposed by 10 CFR 70.39(c) would still apply with respect to any contamination. Based on the above, the proposed relocation of these requirements related to the quantity of allowable contamination on sealed sources to the QA program is appropriate and acceptable.

The licensee has also proposed to delete the Bases for the LCO and Surveillance requirements in the Technical Specifications. The Bases summarize the reasons for the specifications in section 3/4. With the deletion or relocation of all sections of 3/4, as discussed above, there is no need for the Bases. Therefore the proposed deletion is acceptable.

TS 5.1, “Site Location,” currently provides the location of the site, a description of the topography, and the geographical coordinates of the reactor containment structure. The licensee has proposed to delete the description of the topography and the geographical coordinates, and add a reference to the figure in the Updated Final Safety Analysis Report that depicts the site location. The figure provides information equivalent to the topographical description, and the deletion of the geographical coordinates is appropriate given the planned removal of the structure; therefore, the proposed changes are acceptable.

TS 5.2, “Fuel Storage,” currently provides a description of the spent fuel pit design including criticality control, drainage potential, and storage capacity. The licensee has proposed to revise the section to delete the current text and replace it with a description of the maximum number of fuel assemblies to be stored at the ISFSI. With the completion of the transfer of all the spent nuclear fuel from the spent fuel pit to the ISFSI, the requirements of the current description and the inclusion of the revised text will accurately reflect the current plant condition. Therefore, the proposed revision to this TS is acceptable.

TS 6.1, "Responsibility," currently provides a description of the responsibilities of the decommissioning manager and specifies that he reports to the Vice President of Yankee Atomic Electric Company. The licensee proposes to delete both descriptions from the TS. However, an equivalent description of the decommissioning manager’s responsibility is already in the YDQAP. The nature of the proposed deletion of the description of the decommissioning manager’s responsibility, effectively a relocation to the YDQAP, is consistent with those administrative requirements addressed by AL 95-06. Additionally, the description provided in the YDQAP will be controlled by 10 CFR 50.59. Therefore, relocation to the QA program of the decommissioning manager’s responsibility is appropriate and acceptable.

TS 6.2, "Organization," currently provides a general discussion of the corporate and onsite organizations established for corporate management and facility operations, including shift composition and staffing. The licensee proposes to delete this section in its entirety as either redundant to the YDQAP and the YNPS FSAR or as no longer necessary. An equivalent description of the corporate and onsite organizations responsible for the safe operation of the facility is already in the YDQAP and the YNPS FSAR. The nature of the proposed deletion of the description of the corporate and onsite organizations, effectively a relocation to the YDQAP, is consistent with those administrative requirements addressed by AL 95-06. Additionally, the description provided in the YNPS FSAR will be controlled by 10 CFR 50.59. The shift composition and staffing requirements in TS 6.2 are only applicable when fuel is in the spent fuel pit or during fuel handling operations. With the completion of the transfer of all the spent nuclear fuel to the ISFSI, these requirements are clearly no longer applicable. Therefore, the relocation to the QA program of the corporate and onsite organizations and the deletion of the shift composition and staffing requirements is appropriate and acceptable.

TS 6.3, “Facility Staff Qualifications,” currently specifies the minimum qualifications that the facility management, supervisory staff and the radiation protection manager must meet. The licensee has proposed to relocate these requirements verbatim to the YDQAP. The proposed relocation is consistent with the guidance for administrative requirements addressed by AL 95-06, and therefore, is acceptable.

TS 6.4, “Training,” currently specifies that the training program for the certified fuel handlers comply with an NRC approved program and that the unit staff training program meet ANSI N18.1-1971, Section 5.5 requirements. The licensee has proposed to delete these requirements. With the completion of the transfer of all the spent nuclear fuel to the ISFSI, there will no longer be a need for certified fuel handlers or for associated training requirements. Additionally, ANSI N18.1-1971, Section 5.5 requirements address plant operating events that no longer apply with all the fuel moved to the ISFSI. Therefore, the proposed deletion of TS 6.4 is acceptable.

TS 6.6, “Reportable Event Action,” currently specifies the review and reporting requirements for reportable events. The licensee is proposing to relocate this requirements to the YDQAP with only a minor editorial change. This TS delineates the licensee process for compliance with 10 CFR 50.73, “Licensee Event Report System.” The reporting requirements will continue as required by the regulations. The transfer of these administrative controls is consistent with the guidance in AL 95-06. Based on the above, the proposed relocation is acceptable.

TS 6.8, “Reporting Requirements,” currently contains the content and submission requirements for certain annual reports, the environmental radiological monitoring report, the radioactive effluent release report, and other special reports. The licensee is proposing to relocate these requirements to the YDQAP with only minor editorial changes. This TS delineates the licensee process for compliance with 10 CFR 20.2206, “Reports of Individual Monitoring,” and 10 CFR 50.4, “Written Communications.” Thus, the reporting requirements will continue as required by the regulations. The transfer of these administrative controls is consistent with the guidance in AL 95-06. Based on the above, the proposed relocation is acceptable.

TS 6.10, “Radiation Protection Program,” currently requires that radiation protection procedures be approved, maintained, and adhered to and be in compliance with 10 CFR Part 20. The licensee has proposed to relocate these requirements verbatim to the YDQAP. The

requirements of 10 CFR Part 20, “Standards for Protection Against Radiation,” would continue to mandate appropriate personnel protection and the proposed relocation is consistent with the guidance for administrative requirements addressed by AL 95-06. Therefore, the proposed relocation is acceptable.

TS 6.11, “High Radiation Area,” currently specifies the posting and access control requirements for high radiation areas. The purpose of this TS is to meet the requirements in 10 CFR 20, Part G, “Control of Exposure From External Sources in Restricted Areas,” and 10 CFR 20, Part J, “Precautionary Procedures.” The licensee has proposed to relocate these requirements verbatim to the YDQAP. The requirements of 10 CFR Part 20 would continue to mandate appropriate personnel protection and the proposed relocation is consistent with the guidance for administrative requirements addressed by AL 95-06. Therefore, the proposed relocation is acceptable.

TS 6.12, “Process Control Program (PCP),” currently specifies how to document, review and approve changes to the PCP. The intent of this TS is to ensure that the on-site processing and packaging of solidified radioactive wastes complies with 10 CFR Parts 20, 61, and 71. The licensee is proposing to relocate these requirements to the YDQAP with only minor editorial changes. The transfer of these administrative controls is consistent with the guidance in AL 95-06, and therefore, is acceptable.

TS 6.13, “Off-Site Dose Calculation Manual (ODCM),” currently specifies how to document, review and approve changes to the ODCM. The intent of this TS is to ensure that the ODCM continues to meet the requirements of 40 CFR 190, 10 CFR 20, 10 CFR 50.36(a) and 10 CFR 50, Appendix I. The licensee is proposing to relocate these requirements to the YDQAP with only minor editorial changes. The transfer of these administrative controls is consistent with the guidance in AL 95-06, and therefore, is acceptable.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes recordkeeping, reporting, or administrative procedures or requirements. The amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10)(ii). 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 Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: John B. Hickman

Date: April 17, 2003