



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 31, 1989

TO ALL POWER REACTOR LICENSEES AND APPLICANTS

SUBJECT: IMPLEMENTATION OF PROGRAMMATIC CONTROLS FOR RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS IN THE ADMINISTRATIVE CONTROLS SECTION OF THE TECHNICAL SPECIFICATIONS AND THE RELOCATION OF PROCEDURAL DETAILS OF RETS TO THE OFFSITE DOSE CALCULATION MANUAL OR TO THE PROCESS CONTROL PROGRAM (GENERIC LETTER 89-01)

The NRC staff has examined the contents of the Radiological Effluent Technical Specifications (RETS) in relation to the Commission's Interim Policy Statement on Technical Specification Improvements. The staff has determined that programmatic controls can be implemented in the Administrative Controls section of the Technical Specifications (TS) to satisfy existing regulatory requirements for RETS. At the same time, the procedural details of the current TS on radioactive effluents and radiological environmental monitoring can be relocated to the Offsite Dose Calculation Manual (ODCM). Likewise, the procedural details of the current TS on solid radioactive wastes can be relocated to the Process Control Program (PCP). These actions simplify the RETS, meet the regulatory requirements for radioactive effluents and radiological environmental monitoring, and are provided as a line-item improvement of the TS, consistent with the goals of the Policy Statement.

New programmatic controls for radioactive effluents and radiological environmental monitoring are incorporated in the TS to conform to the regulatory requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. Existing programmatic requirements for the PCP are being retained in the TS. The procedural details included in licensees' present TS on radioactive effluents, solid radioactive wastes, environmental monitoring, and associated reporting requirements will be relocated to the ODCM or PCP as appropriate. Licensees will handle future changes to these procedural details in the ODCM and the PCP under the administrative controls for changes to the ODCM or PCP. Finally, the definitions of the ODCM and PCP are updated to reflect these changes.

Enclosure 1 provides guidance for the preparation of a license amendment request to implement these alternatives for RETS. Enclosure 2 provides a listing of existing RETS and a description of how each is addressed. Enclosure 3 provides model TS for programmatic controls for RETS and its associated reporting requirements. Finally, Enclosure 4 provides model specifications for retaining existing requirements for explosive gas monitoring instrumentation requirements that apply on a plant-specific basis. Licensees are encouraged to propose changes to TS that are consistent with the guidance provided in the enclosures. Conforming amendment requests will be expeditiously reviewed by

8901300114

~~AFR~~
~~AFR~~

ID#R-5
INFO-LR

January 31, 1989

the NRC Project Manager for the facility. Proposed amendments that deviate from this guidance will require a longer, more detailed review. Please contact the appropriate Project Manager if you have questions on this matter.

Sincerely,



Steven A. Varga
Acting Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures:
1 through 4 as stated

**GUIDANCE FOR THE IMPLEMENTATION OF PROGRAMMATIC CONTROLS FOR RETS
IN THE ADMINISTRATIVE CONTROLS SECTION OF TECHNICAL SPECIFICATIONS
AND THE RELOCATION OF PROCEDURAL DETAILS OF CURRENT RETS TO THE
OFFSITE DOSE CALCULATION MANUAL OR PROCESS CONTROL PROGRAM**

INTRODUCTION

This enclosure provides guidance for the preparation of a license amendment request to implement programmatic controls in Technical Specifications (TS) for radioactive effluents and for radiological environmental monitoring conforming to the applicable regulatory requirements. This will allow the relocation of existing procedural details of the current Radiological Effluent Technical Specifications (RETS) to the Offsite Dose Calculation Manual (ODCM). Procedural details for solid radioactive wastes will be relocated to the Process Control Program (PCP). A proposed amendment will (1) incorporate programmatic controls in the Administrative Controls section of the TS that satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a. and Appendix I to 10 CFR Part 50, (2) relocate the existing procedural details in current specifications involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the TS to the ODCM, (3) relocate the definition of solidification and existing procedural details in the current specification on solid radioactive wastes to the PCP, (4) simplify the associated reporting requirements, (5) simplify the administrative controls for changes to the ODCM and PCP, (6) add record retention requirements for changes to the ODCM and PCP, and (7) update the definitions of the ODCM and PCP consistent with these changes.

The NRC staff's intent in recommending these changes to the TS and the relocation of procedural details of the current RETS to the ODCM and PCP is to fulfill the goal of the Commission Policy Statement for Technical Specification Improvements. It is not the staff's intent to reduce the level of radiological effluent control. Rather, this amendment will provide programmatic controls for RETS consistent with regulatory requirements and allow relocation of the procedural details of current RETS to the ODCM or PCP. Therefore, future changes to these procedural details will be controlled by the controls for changes to the ODCM or PCP included in the Administrative Controls section of the TS. These procedural details are not required to be included in TS by 10 CFR 50.36a.

DISCUSSION

Enclosure 2 to Generic Letter 89- provides a summary listing of specifications that are included under the heading of RETS in the Standard Technical Specifications (STS) and their disposition. Most of these specifications will be addressed by programmatic controls in the Administrative Controls section of the TS. Some specifications under the heading of RETS are not covered by the new programmatic controls and will be retained as requirements in the existing plant TS. Examples include requirements for explosive gas monitoring instrumentation, limitations on the quantity of radioactivity in liquid or gaseous holdup or storage tanks or in the condenser exhaust for BWRs, or limitations on explosive gas mixtures in offgas treatment systems and storage tanks.

Licenses with nonstandard TS should follow the guidance provided in Enclosure 2 for the disposition of similar requirements in the format of their TS.

Because solid radioactive wastes are addressed under existing programmatic controls for the Process Control Program, which is a separate program from the new programmatic controls for liquid and gaseous radioactive effluents, the requirements for solid radioactive wastes and associated solid waste reporting requirements in current TS are included as procedural details that will be relocated to the PCP as part of this line-item improvement of TS. Also, the staff has concluded that records of licensee reviews performed for changes made to the ODCM and PCP should be documented and retained for the duration of the unit operating license. This approach is in lieu of the current requirements that the reasons for changes to the ODCM and PCP be addressed in the Semiannual Effluent Release Report.

The following items are to be included in a license amendment request to implement these changes. First, the model specifications in Enclosure 3 to Generic Letter 89- should be incorporated into the TS to satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. The definitions of the ODCM and PCP should be updated to reflect these changes. The programmatic and reporting requirements are general in nature and do not contain plant-specific details. Therefore, these changes to the Administrative Controls section of the TS are to replace corresponding requirements in plant TS that address these items. They should be proposed for incorporation into the plant's TS without change in substance to replace existing requirements. If necessary, only changes in format should be proposed. If the current TS include requirements for explosive gas monitoring instrumentation as part of the gaseous effluent monitoring instrumentation requirements, these requirements should be retained. Enclosure 4 to Generic Letter 89- provides model specifications for retaining such requirements.

Second, the procedural details covered in the licensee's current RETS, consisting of the limiting conditions for operation, their applicability, remedial actions, surveillance requirements, and the Bases section of the TS for these requirements, are to be relocated to the ODCM or PCP as appropriate and in a manner that ensures that these details are incorporated in plant operating procedures. The NRC staff does not intend to repeat technical reviews of the relocated procedural details because their consistency with the applicable regulatory requirements is a matter of record from past NRC reviews of RETS. If licensees make other than editorial changes in the procedural details being transferred to the ODCM, each change should be identified by markings in the margin and the requirements of new Specification 6.14a.(1) and (2) followed.

Finally, licensees should confirm in the amendment request that changes for relocating the procedural details of current RETS to either the ODCM or PCP have been prepared in accordance with the proposed changes to the Administrative Controls section of the TS so that they may be implemented immediately upon issuance of the proposed amendment. A complete and legible copy of the revised ODCM should be forwarded with the amendment request for NRC use as a reference. The NRC staff will not concur in or approve the revised ODCM.

Licensees should refer to "Generic Letter 89- " in the Subject line of license amendment requests implementing the guidance of this Generic Letter. This will facilitate the staff's tracking of licensees' responses to this Generic Letter.

SUMMARY

The license amendment request for the line-item improvements of the TS relative to the RETS will entail (1) the incorporation of programmatic controls for radioactive effluents and radiological environmental monitoring in the Administrative Controls section of the TS, (2) incorporation of the procedural details of the current RETS in the ODCM or PCP as appropriate, and (3) confirmation that the guidance of this Generic Letter has been followed.

DISPOSITION OF SPECIFICATIONS AND ADMINISTRATIVE CONTROLS
INCLUDED UNDER THE HEADING OF RETS IN THE STANDARD TECHNICAL SPECIFICATIONS

<u>SPECIFICATION</u>	<u>TITLE</u>	<u>DISPOSITION OF EXISTING SPECIFICATION</u>
1.17	OFFSITE DOSE CALCULATION MANUAL	Definition is updated to reflect the change in scope of the ODCM.
1.22	PROCESS CONTROL PROGRAM	Definition is updated to reflect the change in scope of the PCP.
1.32	SOLIDIFICATION	Definition is relocated to the PCP.
3/4.3.3.10	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION	Programmatic controls are included in 6.8.4 g. Item 1). Existing specification procedural details are relocated to the ODCM.
3/4.3.3.11	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION	Programmatic controls are included in 6.8.4 g. Item 1). Existing specification procedural details are relocated to the ODCM. Existing requirements for explosive gas monitoring instrumentation should be retained. Model specifications for these requirements are provided in Enclosure 4.
3/4.11.1.1	LIQUID EFFLUENTS: CONCENTRATION	Programmatic controls are included in 6.8.4 g. Items 2) and 3). Existing specification procedural details are relocated to the ODCM.
3/4.11.1.2	LIQUID EFFLUENTS: DOSE	Programmatic controls are included in 6.8.4 g. Items 4) and 5). Existing specification procedural details are relocated to the ODCM.
3/4.11.1.3	LIQUID EFFLUENTS: LIQUID RADWASTE TREATMENT SYSTEM	Programmatic controls are included in 6.8.4 g. Item 6). Existing specification procedural details are relocated to the ODCM.
3/4.11.1.4	LIQUID HOLDUP TANKS	Existing specification requirements to be retained.

DISPOSITION OF SPECIFICATIONS AND ADMINISTRATIVE CONTROLS
INCLUDED UNDER THE HEADING OF RETS IN THE STANDARD TECHNICAL SPECIFICATIONS (Cont.)

<u>SPECIFICATION</u>	<u>TITLE</u>	<u>DISPOSITION OF EXISTING SPECIFICATION</u>
3/4.11.2.1	GASEOUS EFFLUENTS: DOSE RATE	Programmatic controls are included in 6.8.4 g. Items 3) and 7). Existing specification procedural details are relocated to the ODCM.
3/4.11.2.2	GASEOUS EFFLUENTS: DOSE-NOBLE GASES	Programmatic controls are included in 6.8.4 g. Items 5) and 8). Existing specification procedural details are relocated to the ODCM.
3/4.11.2.3	GASEOUS EFFLUENTS: DOSE--IODINE-131, IODINE-133, TRITIUM, AND RADIOACTIVE MATERIAL IN PARTICULATE FORM	Programmatic controls are included in 6.8.4 g. Items 5) and 9). Existing specification procedural details are relocated to the ODCM.
3/4.11.2.4	GASEOUS EFFLUENTS: GASEOUS RADWASTE TREATMENT or VENTILATION EXHAUST TREATMENT SYSTEM	Programmatic controls are included in 6.8.4 g. Item 6). Existing specification procedural details are relocated to the ODCM.
3/4.11.2.5	EXPLOSIVE GAS MIXTURE	Existing specification requirements should be retained.
3/4.11.2.6	GAS STORAGE TANKS	Existing specification requirements should be retained.
3/4.11.2.7	MAIN CONDENSER (BWR)	Existing specification requirements should be retained.
3/4.11.2.8	PURGING AND VENTING (BWR Mark II containments)	Programmatic controls are included in 6.8.4 g. Item 10). Existing specification procedural details are relocated to the ODCM.
3/4.11.3	SOLID RADIOACTIVE WASTES	Existing specification procedural details are relocated to the PCP.
3/4.11.4	RADIOACTIVE EFFLUENTS: TOTAL DOSE	Programmatic controls are included in 6.8.4 g. Item 11). Existing specification procedural details are relocated to the ODCM.

**DISPOSITION OF SPECIFICATIONS AND ADMINISTRATIVE CONTROLS
INCLUDED UNDER THE HEADING OF RETS IN THE STANDARD TECHNICAL SPECIFICATIONS (Cont.)**

<u>SPECIFICATION</u>	<u>TITLE</u>	<u>DISPOSITION OF EXISTING SPECIFICATION</u>
3/4.12.1	RADIOLOGICAL ENVIRONMENTAL MONITORING: MONITORING PROGRAM	Programmatic controls are included in 6.8.4 h. Item 1). Existing specification procedural details are relocated to the ODCM.
3/4.12.2	RADIOLOGICAL ENVIRONMENTAL MONITORING: LAND USE CENSUS	Programmatic controls are included in 6.8.4 h. Item 2). Existing specification procedural details are relocated to the ODCM.
3/4.12.3	RADIOLOGICAL ENVIRONMENTAL MONITORING: INTERLABORATORY COMPARISON PROGRAM	Programmatic controls are included in 6.8.4 h. Item 3). Existing specification procedural details are relocated to the ODCM.
5.1.3	DESIGN FEATURES: SITE - MAP DEFINING UNRESTRICTED AREAS AND SITE BOUNDARY FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS	Existing specification requirements should be retained.
6.9.1.3	REPORTING REQUIREMENTS: ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT	Specification simplified and existing reporting details are relocated to the ODCM.
6.9.1.4	REPORTING REQUIREMENTS: SEMI-ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT	Specification simplified and existing reporting details are relocated to the ODCM or PCP as appropriate.
6.13	PROCESS CONTROL PROGRAM	Specification requirements are simplified.
6.14	OFFSITE DOSE CALCULATION MANUAL	Specification requirements are simplified.
6.15	MAJOR CHANGES TO LIQUID, GASEOUS, AND SOLID RADWASTE TREATMENT SYSTEMS	Existing procedural details are relocated to the ODCM or PCP as appropriate.

TECHNICAL SPECIFICATIONS TO BE REVISED

- 1.17 DEFINITIONS: OFFSITE DOSE CALCULATION MANUAL
- 1.22 DEFINITIONS: PROCESS CONTROL PROGRAM
- 6.8.4 g. PROCEDURES AND PROGRAMS: RADIOACTIVE EFFLUENT CONTROLS
- 6.8.4 h. PROCEDURES AND PROGRAMS: RADIOLOGICAL ENVIRONMENTAL MONITORING
- 6.9.1.3 REPORTING REQUIREMENTS: ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT
- 6.9.1.4 REPORTING REQUIREMENTS: SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT
- 6.10 RECORD RETENTION
- 6.13 PROCESS CONTROL PROGRAM (PCP)
- 6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

MODEL TECHNICAL SPECIFICATION REVISIONS

(To supplement or replace existing specifications)

1.0 DEFINITIONS

OFFSITE DOSE CALCULATION MANUAL

1.17 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Semi-annual Radioactive Effluent Release Reports required by Specifications 6.9.1.3 and 6.9.1.4.

1.22 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.

6.0 ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

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

g. Radioactive Effluent Controls Program

A program shall be provided conforming with 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 (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:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and set-point determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,
- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table II, Column 1,

ADMINISTRATIVE CONTROLS

6.8.4 g. Radioactive Effluent Controls Program (Cont.)

- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 10) Limitations on venting and purging of the Mark II containment through the Standby Gas Treatment System to maintain releases as low as reasonably achievable (BWRs w/Mark II containments), and
- 11) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

h. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

ADMINISTRATIVE CONTROLS

6.9 REPORTING REQUIREMENTS**ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT***

6.9.1.3 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT**

6.9.1.4 The Semiannual Radioactive Effluent Release Report covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

6.10 RECORD RETENTION

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.13 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

*A single submittal may be made for a multi-unit station.

**A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP) (Cont.)

- 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the [URG] and the approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)**Changes to the ODCM:**

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the [URG] and the approval of the Plant Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Semiannual Radioactive Effluent Release Report for the period of the report in which any change to 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 (e.g., month/year) the change was implemented.

MODIFICATION OF THE SPECIFICATION FOR RADIOACTIVE GASEOUS
EFFLUENT MONITORING INSTRUMENTATION TO RETAIN REQUIREMENTS
FOR EXPLOSIVE GAS MONITORING INSTRUMENTATION

INSTRUMENTATIONEXPLOSIVERADIOACTIVE GASEOUS-EFFLUENT MONITORING INSTRUMENTATIONLIMITING CONDITION FOR OPERATIONexplosive

3.3.3.11 The radioactive gaseous-effluent monitoring instrumentation channels shown in Table 3.3-13 shall be OPERABLE with their Alarm/Trip Setpoints set to ensure that the limits of Specifications 3-11-2-1 and 3.11.2.5 are not exceeded. ~~The Alarm/Trip Setpoints of these channels meeting Specification 3-11-2-1 shall be determined and adjusted in accordance with the methodology and parameters in the OBCM.~~

APPLICABILITY: As shown in Table 3.3-13

ACTION:explosive

- a. With an radioactive gaseous-effluent monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above specification; ~~immediately suspend the release of radioactive gaseous-effluents monitored by the affected channel; or declare the channel inoperable and take the ACTION shown in Table 3.3-13.~~
- b. With less than the minimum number of explosive radioactive gaseous-effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-13. Restore the inoperable instrumentation to OPERABLE status within 30 days and, if unsuccessful ~~explain in the next Semi-annual Radioactive Effluent Release Report~~ prepare and submit a Special Report to the Commission pursuant to Specification 6-9-1-4 6.9.2 to explain why this inoperability was not corrected in a timely manner.
- c. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTSexplosive

4.3.3.11 Each radioactive gaseous-effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK; CHANNEL CALIBRATION and ANALOG CHANNEL OPERATIONAL TEST at the frequencies shown in Table 4.3-9.

Sample STS

3/4 3-(n+1)

TABLE 3.3-13
EXPLOSIVE
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABILITY</u>	<u>ACTION</u>
1. (Not used)			
2A. WASTE GAS HOLDUP SYSTEM Explosive Gas Monitoring System (for systems designed to withstand the effects of a hydrogen explosion)			
a. Hydrogen Monitor (Automatic Control)	1	**	49
b. Hydrogen or Oxygen Monitor (Process)	1	**	49
2B. WASTE GAS HOLDUP SYSTEM Explosive Gas Monitoring System (for systems not designed to withstand the effects of a hydrogen explosion)			
a. Hydrogen Monitors (Automatic Control, redundant)	2	**	50, 52
b. Hydrogen or Oxygen Monitors (Process, dual)	2	**	50

Generic Letter 89-01

- 2 -

Enclosure 4

TABLE 3.3-13 (Continued)

* (Not used)

** During WASTE GAS HOLDUP SYSTEM operation.

ACTION STATEMENTS

ACTION 45 - (Not used)

ACTION 46 - (Not used)

ACTION 47 - (Not used)

ACTION 48 - (Not used)

ACTION 49 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, operation of this WASTE GAS HOLDUP SYSTEM may continue provided grab samples are collected at least once per 4 hours and analyzed within the following 4 hours.

ACTION 50 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, operation of this system may continue provided grab samples are taken and analyzed at least once per 24 hours. With both channels inoperable, operation may continue provided grab samples are taken and analyzed at least once per 4 hours during degassing operations and at least once per 24 hours during other operations.

ACTION 51 - (Not used)

ACTION 52 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, suspend oxygen supply to the recombiner.

Sample STS

3/4 3-(n+3)

TABLE 4.3-9

EXPLOSIVE RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>SOURCE CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL OPERATIONAL TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
1. (Not used)					
2A. WASTE GAS HOLDUP SYSTEM Explosive Gas Monitoring System (for systems designed to withstand the effects of a hydrogen explosion)					
a. Hydrogen Monitor (Automatic Control)	D	N/A	Q(4)	M	**
b. Hydrogen or Oxygen Monitor (Process)	D	N/A	Q(4) or Q(5)	M	**
2B. WASTE GAS HOLDUP SYSTEM Explosive Gas Monitoring System (for systems not designed to withstand the effects of a hydrogen explosion)					
a. Hydrogen Monitors (Automatic Control, redundant)	D	N/A	Q(4)	M	**
b. Hydrogen or Oxygen Monitors (Process, dual)	D	N/A	Q(4) or Q(5)	M	**

Generic Letter 89-01

- 4 -

Enclosure 4

TABLE 4.3-9 (Continued)TABLE NOTATIONS

- * (Not used)
- ** During WASTE GAS HOLDUP SYSTEM operation.
- (1) (Not used)
- (2) (Not used)
- (3) (Not used)
- (4) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:
 - a. One volume percent hydrogen, balance nitrogen, and
 - c. Four volume percent hydrogen, balance nitrogen.
- (5) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:
 - a. One volume percent oxygen, balance nitrogen, and
 - b. Four volume percent oxygen, balance nitrogen.

LIST OF RECENTLY ISSUED GENERIC LETTERS

Generic Letter No.	Subject	Date of Issuance	Issued To
88-20	INDIVIDUAL PLANT EXAMINATION FOR SEVERE ACCIDENT VULNERABILITIES - 10 CFR 50.54(f)	11/23/88	ALL LICENSEES HOLDING OPERATING LICENSES AND CONSTRUCTION PERMITS FOR NUCLEAR POWER REACTOR FACILITIES
88-19	USE OF DEADLY FORCE BY LICENSEE GUARDS TO PREVENT THEFT OF SPECIAL NUCLEAR MATERIAL	10/28/88	ALL FUEL CYCLE FACILITY LICENSEES WHO POSSESS, USE, IMPORT, EXPORT, OR TRANSPORT FORMULA QUANTITIES OF STRATEGIC SPECIAL NUCLEAR MATERIAL
88-18	PLANT RECORD STORAGE ON OPTICAL DISKS	10/20/88	ALL LICENSEES OF OPERATING REACTORS AND HOLDERS OF CONSTRUCTION PERMITS
88-17	LOSS OF DECAY HEAT REMOVAL 10 CFR 50.54(f)	10/17/88	ALL HOLDERS OF OPERATING LICENSES OR CONSTRUCTION PERMITS FOR PRESSURIZED WATER REACTORS
88-16	REMOVAL OF CYCLE-SPECIFIC PARAMETER LIMITS FROM TECHNICAL SPECIFICATIONS	10/04/88	ALL POWER REACTOR LICENSEES AND APPLICANTS
88-15	ELECTRIC POWER SYSTEMS - INADEQUATE CONTROL OVER DESIGN PROCESSES	09/12/88	ALL POWER REACTOR LICENSEES AND APPLICANTS
88-14	INSTRUMENT AIR SUPPLY SYSTEM PROBLEMS AFFECTING SAFETY-RELATED EQUIPMENT	08/08/88	ALL HOLDERS OF OPERATING LICENSES OR CONSTRUCTION PERMITS FOR NUCLEAR POWER REACTORS
88-13	OPERATOR LICENSING EXAMINATIONS	08/08/88	ALL POWER REACTOR LICENSEES AND APPLICANTS FOR AN OPERATING LICENSE.
88-12	REMOVAL OF FIRE PROTECTION REQUIREMENTS FROM TECHNICAL SPECIFICATIONS	08/02/88	ALL POWER REACTOR LICENSEES AND APPLICANTS

the NRC Project Manager for the facility. Proposed amendments that deviate from this guidance will require a longer, more detailed review. Please contact the appropriate Project Manager if you have questions on this matter.

Sincerely,

Original Signed By

Steven A. Varga
Acting Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures:
1 through 4 as stated

Distribution:

- OTSB R/F
- DOEA R/F
- PDR
- Central Files
- JHSniezek
- FJMiraglia
- SAVarga
- DMCrutchfield
- GHolahan
- FJCongel
- CERossi
- LCShao
- SATreby
- RLFonner
- CHBerlinger
- EJButcher
- LJCunningham
- JWCraig
- RLEmch
- THEssig
- TGDunning
- WMeinke
- JHConran
- CASakenas

*On 1/5/89, CRGR approved issuance of this Generic Letter subject to resolution of comments by Mr. Sniezek. Mr. Sniezek's comments have been resolved to his satisfaction and CRGR told us on 1/5/89 that they did not need to re-review the Generic Letter after Mr. Sniezek's comments were resolved. RLE
1/23/89*

for RLE
OTSB:DOEA
TGDunning:td
01/23/89

RLE
OTSB:DOEA
RLEmch
01/23/89

RLE
C:OTSB:DOEA
EJButcher
01/23/89

CHB
C:OGCB:DOEA
CHBerlinger
01/23/89

HS 1/24/89
ASDP:ARR
SAVarga
01/23/89

the NRC Project Manager for the facility. Proposed amendments that deviate from this guidance will require a longer, more detailed review. Please contact the appropriate Project Manager if you have questions on this matter.

Sincerely,

Original Signed By

Steven A. Varga
Acting Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures:
1 through 4 as stated

Distribution:

- OTSB R/F
- DOEA R/F
- PDR
- Central Files
- JHSniezek
- FJMiraglia
- SAVarga
- DMCrutchfield
- GHolahan
- FJCongel
- CERossi
- LCShao
- SATreby
- RLFonner
- CHBerlinger
- EJButcher
- LJCunningham
- JWCraig
- REmch
- THEssig
- TGDunning
- WMeinke
- JHConran
- CASakenas

*On 1/5/89, CRGR approved issuance of this Generic Letter subject to resolution of comments by Mr. Sniezek. Mr. Sniezek's comments have been resolved to his satisfaction and CRGR told us on 1/5/89 that they did not need to re-review the Generic Letter after Mr. Sniezek's comments were resolved. RJE
1/23/89*

HS 1/24/89

for RJE
OTSB:DOEA
TGDunning:td
01/23/89

OTSB:DOEA
REmch
01/23/89

C:OTSB:DOEA
EJButcher
01/23/89

CHB
C:OGCB:DOEA
CHBerlinger
01/23/89

AAIP:NR
SAVarga
01/23/89