#### FOR INCLUSION ON TECHNICAL SPECIFICATION WEB PAGE

The following example of an application was prepared by the NRC staff to facilitate the use of the consolidated line item improvement process (CLIIP). The model provides the expected level of detail and content for an application to adopt revision 1 to TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," using CLIIP. Licensees remain responsible for ensuring that their actual application fulfills their administrative requirements as well as NRC regulations.

U. S. Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555

SUBJECT: PLANT NAME DOCKET NO. 50-APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO ELIMINATE REQUIREMENTS TO PROVIDE MONTHLY OPERATING REPORTS AND OCCUPATIONAL RADIATION EXPOSURE REPORTS

#### Gentlemen:

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), [LICENSEE] is submitting a request for an amendment to the technical specifications (TS) for [PLANT NAME, UNIT NOS.].

The proposed amendment would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports. The change is consistent with NRC-approved Revision 1 to industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the <u>Federal Register</u> on [DATE OF NOTICE OF AVAILABILITY] as part of the consolidated line item improvement process (CLIIP).

Enclosure 1 provides a description of the proposed change and confirmation of applicability. Enclosure 2 provides the existing TS pages marked-up to show the proposed change.

[LICENSEE] requests approval of the proposed license amendment by [DATE], with the amendment being implemented [BY DATE OR WITHIN X DAYS].

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated [STATE] Official.

I declare under penalty of perjury under the laws of the United States of America that I am authorized by [LICENSEE] to make this request and that the foregoing is true and correct. [Note that request may be notarized in lieu of using this oath or affirmation statement].

If you should have any questions regarding this submittal, please contact [].

Sincerely,

Name, Title

Enclosures: 1. Description and Assessment 2. Proposed Technical Specification Changes

cc: NRR Project Manager Regional Office Resident Inspector State Contact

## **ATTACHMENT 1**

### **Description and Assessment**

### 1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Technical Specification (TS) [5.6.1] for an annual report on occupational radiation exposures and TS [5.6.4] for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification improvement was announced in the <u>Federal Register</u> on [DATE] as part of the consolidated line item improvement process (CLIIP).

### 2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS [5.6.1]	Occupational Radiation Exposure Report	Deleted
TS [5.6.4]	Monthly Operating Reports	Deleted

[optional: As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, [LICENSEE] is proposing to adopt a part of NRC-approved Revision 4 to TSTF-258, "Changes to Section 5.0, Administrative Controls." Specifically, TS [5.6.4] includes a requirement to include in the monthly operating reports any challenges to (pressurizer power operated relief valves or pressurizer safety valves (for pressurized water reactors) or safety/relief valves (for boiling water reactors)). The NRC model safety evaluation addressed the removal of requirements to submit monthly operating reports in those cases where the TS includes a requirement to address challenges to relief and safety valves (i.e., if a licensee had not yet adopted the associated part of TSTF-258). The proposed change is consistent with the option described in the Notice of Availability published on [DATE] and the related documentation for both TSTF-369 and the limited portion of TSTF-258 included in this application.]

[optional: As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, the removal of TS [5.6.1] and TS [5.6.4] resulted in various editorial and formatting changes such as the renumbering of TS sections. These changes reflect the renumbering of TS sections but do not revise technical or administrative requirements.]

[Optional: This application involves a site with ((both boiling and pressurized water reactors) or (both operating and shutdown reactors)). As addressed in the Notice of Availability for TSTF-369, [LICENSEE] has included in this application a regulatory commitment to support the NRC need to apportion doses reported under 10 CFR Part 20 to the different categories of reactors at the site.]

# 3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on [DATE] (69 FR xxxxx) and TSTF-369.

## 4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on [DATE] (69 FR xxxxx) and TSTF-369.

# 5.0 TECHNICAL ANALYSIS

[LICENSEE] has reviewed the safety evaluation (SE) published on [DATE] (69 FR xxxx) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. [LICENSEE] has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and justify this amendment for the incorporation of the changes to the [PLANT] TS.

## 6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on [DATE] (69 FR xxxxx) and TSTF-369.

## 6.1 <u>Verification and Commitments</u>

As discussed in the model SE published in the <u>Federal Register</u> on [DATE] (69 FR xxxxx) for this TS improvement, [LICENSEE] is making the following regulatory commitments:

- 1. [LICENSEE] is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calender month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).
- 2. [SITE] has [does not have] different reactor types or both operating and shutdown reactors.

For sites with different reactor types or operating and shutdown units: [LICENSEE] is making a regulatory commitment to provide information to the NRC annually (e.g., with the annual submittal in accordance with 10 CFR 20.2206) to support the apportionment of station doses [(to each type of reactor) or (to differentiate between operating and shutdown units)]. The data will provide the summary distribution of annual whole body doses as presented in Appendix B of NUREG-0713 for each reactor type and for operating and shutdown units.

#### 7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

[LICENSEE] has reviewed the proposed no significant hazards consideration determination published on [DATE] (69 FR xxxx) as part of the CLIIP. [LICENSEE] has concluded that the proposed determination presented in the notice is applicable to [PLANT] and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

### 8.0 ENVIRONMENTAL EVALUATION

[LICENSEE] has reviewed the environmental evaluation included in the model SE published on [DATE] (69 FR xxxx) as part of the CLIIP. [LICENSEE] has concluded that the staff's findings presented in that evaluation are applicable to [PLANT] and the evaluation is hereby incorporated by reference for this application.

#### 9.0 PRECEDENT

This application is being made in accordance with the CLIIP. [LICENSEE] is not proposing variations or deviations from the TS changes described in TSTF-369 [and the limited portion of TSTF-258] or the NRC staff's model SE published on [DATE] (69 FR xxxxxx).

### 10.0 <u>REFERENCES</u>

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published [DATE], (69 FR xxxxx).

## ATTACHMENT 2

#### PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

## **ATTACHMENT 3**

## PROPOSED TECHNICAL SPECIFICATION PAGES

Distribution: PUBLIC PDIV-1 Reading File

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#### ADAMS ACCESSION NO. 0418090481

OFC	NRR/DLPM/PM	NRR/DLPM/LA	NRR/DLPM/PDIV	
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