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Michael R. Kansler
President

September 1, 2004
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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Pilgrim Nuclear Power Station
Docket No. 50-293
Vermont Yankee Nuclear Power Station
Docket No. 50-271
**Application for Technical Specifications Improvement to
Eliminate Requirements to Provide Monthly Operating Reports
and Occupational Radiation Exposure Reports Using the
Consolidated Line Item Improvement Process**

Gentlemen:

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), Entergy Nuclear Operations, Inc. (ENO) is submitting a request for amendments to the Technical Specifications (TS) for the James A. FitzPatrick Nuclear Power Plant, the Pilgrim Nuclear Power Station, and the Vermont Yankee Nuclear Power Station.

The proposed amendments would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports. 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," Rev. 1. The availability of this TS improvement was announced in the *Federal Register* on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIIP).

Attachment 1 provides a description of the proposed changes and confirmation of applicability, the existing TS pages marked-up to show the proposed changes, re-typed TS pages with the appropriate changes, and a summary of regulatory commitments for the James A. FitzPatrick Nuclear Power Plant.

Attachments 2 and 3 provide the same detailed descriptions of the proposed changes for the Pilgrim Nuclear Power Station and the Vermont Yankee Nuclear Power Station respectively.

ENO requests approval of the proposed license amendments by July 31, 2005, with the amendments being implemented within 60 days from the date of the approval.

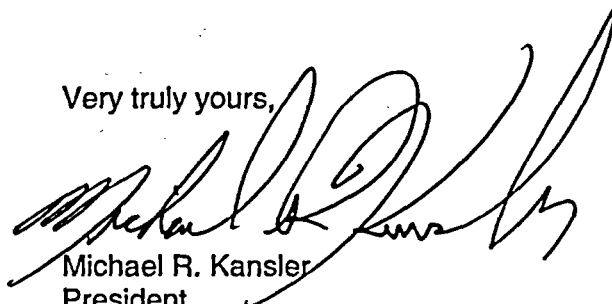
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In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated New York, Massachusetts and Vermont State Officials.

The commitments made in this letter are contained in Attachments 1, 2, and 3. If you have any questions, please contact Ms. Charlene Faison at 914-272-3378.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 1st day of September, 2004.

Very truly yours,



Michael R. Kansler
President
Entergy Nuclear Operations, Inc.

cc: Next page

Attachments:

1. Application for Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process – James A. FitzPatrick Nuclear Power Plant
2. Application for Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process – Pilgrim Nuclear Power Station
3. Application for Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process – Vermont Yankee Nuclear Power Station

cc:

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ATTACHMENT 1

**James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333**

**APPLICATION FOR TECHNICAL SPECIFICATIONS IMPROVEMENT
TO ELIMINATE REQUIREMENTS TO PROVIDE
MONTHLY OPERATING REPORTS AND
OCCUPATIONAL RADIATION EXPOSURE REPORTS
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

Enclosures

- **DESCRIPTION AND ASSESSMENT**
(3 pages)
- **TECHNICAL SPECIFICATION PAGES (MARKED-UP)**
(2 pages)

TS Pages 5.6-1
5.6-2
- **TECHNICAL SPECIFICATION PAGES (RE-TYPED)**
(3 pages)

TS Pages 5.6-1
5.6-2
5.6-3
- **SUMMARY OF REGULATORY COMMITMENTS**
(1 page)

Attachment 1
Entergy Nuclear Operations, Inc. – FitzPatrick Nuclear Power Plant
Docket No. 50-333

Description and Assessment

1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Technical Specification (TS) section 5.6.1 for an annual report on occupational radiation exposures and TS section 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 TS improvement was announced in the *Federal Register* on June 23, 2004 (69 FR 35067), 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	Reporting Requirements – <u>Occupational Radiation Exposure Report</u>	Deleted
TS 5.6.4	Reporting Requirements – <u>Monthly Operating Reports</u>	Deleted

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Rev. 1.

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 June 23, 2004 (69 FR 35067) and TSTF-369, Rev.1.

5.0 TECHNICAL ANALYSIS

Entergy Nuclear Operations, Inc. (ENO) has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's safety evaluation as well as the supporting information provided to support TSTF-369, Rev. 1. ENO has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to FitzPatrick and justify this amendment for the incorporation of the changes to the FitzPatrick TS.

Attachment 1
Entergy Nuclear Operations, Inc. – FitzPatrick Nuclear Power Plant
Docket No. 50-333

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 June 23, 2004 (69 FR 35067) and TSTF-369, Rev. 1.

6.1 Verification and Commitments

As discussed in the model safety evaluation published in the *Federal Register* on June 23, 2004 (69 FR 35067) for this TS improvement, ENO is making the following regulatory commitment:

- ENO is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar 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 going forward from approval of this amendment will be provided using CDE).

In regards to the second commitment discussed in the *Federal Register* on June 23, 2004 (69 FR 35067) pertaining to the apportionment of station doses, FitzPatrick is a single unit site and neither has different reactor types nor both operating and shutdown reactors on the same site. Therefore, this commitment does not apply.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

ENO has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIIP. ENO has concluded that the proposed determination presented in the notice is applicable to FitzPatrick and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

ENO has reviewed the environmental evaluation included in the model safety evaluation published on June 23, 2004 (69 FR 35067) as part of the CLIIP. ENO has concluded that the staff's findings presented in that evaluation are applicable to FitzPatrick and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. ENO is not proposing variations or deviations from the TS changes described in TSTF-369, Rev. 1, or the NRC staff's model safety evaluation published on June 23, 2004 (69 FR 35067).

Attachment 1
Entergy Nuclear Operations, Inc. – FitzPatrick Nuclear Power Plant
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10.0 REFERENCES

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 June 23, 2004 (69 FR 35067).

Attachment 1
Entergy Nuclear Operations, Inc. – FitzPatrick Nuclear Power Plant
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TECHNICAL SPECIFICATION PAGES (MARKED-UP)

TS PAGES

5.6-1

5.6-2

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

Not Used

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescent dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totalling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report, covering the previous calendar year shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the plant during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses 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 the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period at the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the plant during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the plant. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Not Used

Routing reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. The AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR) of Specification 3.2.1;
 2. The MINIMUM CRITICAL POWER RATIO (MCPR) of Specification 3.2.2;
 3. The LINEAR HEAT GENERATION RATE (LHGR) of Specification 3.2.3;

(continued)

Attachment 1
Entergy Nuclear Operations, Inc. – FitzPatrick Nuclear Power Plant
Docket No. 50-333

TECHNICAL SPECIFICATION PAGES (RE-TYPED)

TS PAGES

5.6-1

5.6-2

5.6-3

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Not Used

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the plant during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses 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 the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period at the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the plant during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the plant. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

(continued)

5.6 Reporting Requirements (continued)

5.6.4 Not Used

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
 1. The AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR) of Specification 3.2.1;
 2. The MINIMUM CRITICAL POWER RATIO (MCPR) of Specification 3.2.2;
 3. The LINEAR HEAT GENERATION RATE (LHGR) of Specification 3.2.3;
 4. The Reactor Protection System (RPS) APRM Neutron Flux-High (Flow Biased) Function Allowable Value of Table 3.3.1.1-1;
 5. The Rod Block Monitor-Upscale Function Allowable Value of Table 3.3.2.1-1; and
 6. The Power/Flow Exclusion Region of Specification 3.4.1.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following document:
 1. NEDE-24011-P-A, General Electric Standard Application for Reactor Fuel;
 2. NEDC-31317P, James A. FitzPatrick Nuclear Power Plant SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis; and
 3. NEDO-31960-A, BWR Owners' Group Long-Term Stability Solutions Licensing Methodology.

The COLR will contain the complete identification for each of the Technical Specification referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).

(continued)

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued)

- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 PAM Report

When a report is required by Condition B or F of LCO 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

Attachment 1
Entergy Nuclear Operations, Inc. – FitzPatrick Nuclear Power Plant
Docket No. 50-333

SUMMARY OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by ENO in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Commitments	Description	Completion Schedule
	FitzPatrick will provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, 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 going forward from approval of this amendment will be provided using CDE).	60 days from the date of approval of the proposed amendment.

ATTACHMENT 2

**Pilgrim Nuclear Power Station
Docket No. 50-293**

**APPLICATION FOR TECHNICAL SPECIFICATIONS IMPROVEMENT
TO ELIMINATE REQUIREMENTS TO PROVIDE
MONTHLY OPERATING REPORTS AND
OCCUPATIONAL RADIATION EXPOSURE REPORTS
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

Enclosures

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(3 pages)
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(2 pages)

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5.0-12
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(2 pages)

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Description and Assessment

1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Technical Specification (TS) section 5.6.1 for an annual report on occupational radiation exposures and TS section 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 TS improvement was announced in the *Federal Register* on June 23, 2004 (69 FR 35067), 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	Reporting Requirements – <u>Occupational Radiation Exposure Report</u>	Deleted
TS 5.6.4	Reporting Requirements – <u>Monthly Operating Reports</u>	Deleted

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Rev. 1.

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 June 23, 2004 (69 FR 35067) and TSTF-369, Rev.1.

5.0 TECHNICAL ANALYSIS

Entergy Nuclear Operations, Inc. (ENO) has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's safety evaluation as well as the supporting information provided to support TSTF-369, Rev. 1. ENO has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Pilgrim and justify this amendment for the incorporation of the changes to the Pilgrim 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 June 23, 2004 (69 FR 35067) and TSTF-369, Rev. 1.

6.1 Verification and Commitments

As discussed in the model safety evaluation published in the *Federal Register* on June 23, 2004 (69 FR 35067) for this TS improvement, ENO is making the following regulatory commitment:

- ENO is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar 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 going forward from approval of this amendment will be provided using CDE).

In regards to the second commitment discussed in the *Federal Register* on June 23, 2004 (69 FR 35067) pertaining to the apportionment of station doses, Pilgrim is a single unit site and neither has different reactor types nor both operating and shutdown reactors on the same site. Therefore, this commitment does not apply.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

ENO has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIIP. ENO has concluded that the proposed determination presented in the notice is applicable to Pilgrim and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

ENO has reviewed the environmental evaluation included in the model safety evaluation published on June 23, 2004 (69 FR 35067) as part of the CLIIP. ENO has concluded that the staff's findings presented in that evaluation are applicable to Pilgrim and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. ENO is not proposing variations or deviations from the TS changes described in TSTF-369, Rev. 1, or the NRC staff's model safety evaluation published on June 23, 2004 (69 FR 35067).

Attachment 2
Entergy Nuclear Operations, Inc. – Pilgrim Nuclear Power Station
Docket No. 50-293

10.0 REFERENCES

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 June 23, 2004 (69 FR 35067).

Attachment 2
Entergy Nuclear Operations, Inc. – Pilgrim Nuclear Power Station
Docket No. 50-293

TECHNICAL SPECIFICATION PAGES (MARKED-UP)

TS PAGES

5.0-11
5.0-12

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1

~~Not Used~~

~~Occupational Radiation Exposure Report~~

~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures > 100 mrem/yr and their associated man rem exposure according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (including description), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totaling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources should be assigned to specific major work functions. The report shall be submitted by April 30 of each year.~~

5.6.2

Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses 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 the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include a summary of the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

(Continued)

5.6 Reporting Requirements

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a by May 15th 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 consistent with the objectives outlined in the ODCM and process control procedures and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

Not Used

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 Core Operating Limits Report (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. Table 3.1.1 – APRM High Flux trip level setting
2. Table 3.2.C – APRM Upscale trip level setting
3. 3.11.A – Average Planar Linear Heat Generation Rate (APLHGR)
4. 3.11.B – Linear Heat Generation Rate (LHGR)
5. 3.11.C – Minimum Critical Power Ratio (MCPR)
6. 3.11.D – Power/Flow Relationship During Power Operation

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

1. NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," (through the latest approved amendment at the time the reload analyses are performed as specified in the COLR).

(Continued)

Attachment 2
Entergy Nuclear Operations, Inc. – Pilgrim Nuclear Power Station
Docket No. 50-293

TECHNICAL SPECIFICATION PAGES (RE-TYPED)

TS PAGES

5.0-11

5.0-12

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Not Used

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses 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 the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include a summary of the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

(Continued)

5.6 Reporting Requirements

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a by May 15th 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 consistent with the objectives outlined in the ODCM and process control procedures and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Not Used

5.6.5 Core Operating Limits Report (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
 1. Table 3.1.1 – APRM High Flux trip level setting
 2. Table 3.2.C –APRM Upscale trip level setting
 3. 3.11.A – Average Planar Linear Heat Generation Rate (APLHGR)
 4. 3.11.B – Linear Heat Generation Rate (LHGR)
 5. 3.11.C –Minimum Critical Power Ratio (MCPR)
 6. 3.11.D – Power/Flow Relationship During Power Operation
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
 1. NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," (through the latest NRC approved amendment at the time the reload analyses are performed as specified in the COLR).

(Continued)

Attachment 2
Entergy Nuclear Operations, Inc. – Pilgrim Power Station
Docket No. 50-293

SUMMARY OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by ENO in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Commitments	Description	Completion Schedule
	Pilgrim will provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, 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 going forward from approval of this amendment will be provided using CDE).	60 days from the date of approval of the proposed amendment.

ATTACHMENT 3

**Vermont Yankee Nuclear Power Station
Docket No. 50-271**

**APPLICATION FOR TECHNICAL SPECIFICATIONS IMPROVEMENT
TO ELIMINATE REQUIREMENTS TO PROVIDE
MONTHLY OPERATING REPORTS AND
OCCUPATIONAL RADIATION EXPOSURE REPORTS
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS
(TECHNICAL SPECIFICATIONS PROPOSED CHANGE NO. 269)**

Enclosures

- **DESCRIPTION AND ASSESSMENT**
(3 pages)
- **TECHNICAL SPECIFICATION PAGES (MARKED-UP)**
(2 pages)

TS Pages 258
259
- **TECHNICAL SPECIFICATION PAGES (RE-TYPED)**
(2 pages)

TS Pages 258
259
- **SUMMARY OF REGULATORY COMMITMENTS**
(1 page)

Attachment 3
Entergy Nuclear Operations, Inc. – Vermont Yankee Nuclear Power Station
Docket No. 50-271

Description and Assessment

1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Technical Specification (TS) section 6.6.A for an annual report on occupational radiation exposures and TS section 6.6.B 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 TS improvement was announced in the *Federal Register* on June 23, 2004 (69 FR 35067), 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 6.6.A	Reporting Requirements – <u>Occupational Radiation Exposure Report</u>	Deleted
TS 6.6.B	Reporting Requirements – <u>Monthly Operating Reports</u>	Deleted

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Rev. 1.

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 June 23, 2004 (69 FR 35067) and TSTF-369, Rev.1.

5.0 TECHNICAL ANALYSIS

Entergy Nuclear Operations, Inc. (ENO) has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's safety evaluation as well as the supporting information provided to support TSTF-369, Rev. 1. ENO has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Vermont Yankee and justify this amendment for the incorporation of the changes to the Vermont Yankee 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 June 23, 2004 (69 FR 35067) and TSTF-369, Rev. 1.

6.1 Verification and Commitments

As discussed in the model safety evaluation published in the *Federal Register* on June 23, 2004 (69 FR 35067) for this TS improvement, ENO is making the following regulatory commitment:

- ENO is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar 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 going forward from approval of this amendment will be provided using CDE).

In regard to the second commitment discussed in the *Federal Register* on June 23, 2004 (69 FR 35067) pertaining to the apportionment of station doses, Vermont Yankee is a single unit site and neither has different reactor types nor both operating and shutdown reactors on the same site. Therefore, this commitment does not apply.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

ENO has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIIP. ENO has concluded that the proposed determination presented in the notice is applicable to Vermont Yankee and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

ENO has reviewed the environmental evaluation included in the model safety evaluation published on June 23, 2004 (69 FR 35067) as part of the CLIIP. ENO has concluded that the staff's findings presented in that evaluation are applicable to Vermont Yankee and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. ENO is not proposing variations or deviations from the TS changes described in TSTF-369, Rev. 1, or the NRC staff's model safety evaluation published on June 23, 2004 (69 FR 35067)

Attachment 3
Entergy Nuclear Operations, Inc. – Vermont Yankee Nuclear Power Station
Docket No. 50-271

10.0 REFERENCES

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 June 23, 2004 (69 FR 35067).

Attachment 3
Entergy Nuclear Operations, Inc. – Vermont Yankee Nuclear Power Station
Docket No. 50-271

TECHNICAL SPECIFICATION PAGES (MARKED-UP)

TS PAGES

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VYNPS

- A. Paragraph 20.1601, "Control of Access to High Radiation Areas. In lieu of the "control device" or "alarm signal" required by Paragraph 20.1601(a), each high radiation area in which the intensity of radiation is greater than 100 mrem/hr at 30 cm, but less than 1000 mrem/hr at 30 cm, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Radiation Protection personnel qualified in radiation protection procedures (e.g., radiation protection technicians) may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

Any individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
 2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
 3. A Radiation Protection individual qualified in radiation protection procedures (e.g., radiation protection technicians) with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and who will perform direct or remote (such as closed circuit TV cameras) periodic radiation surveillance at the frequency specified in the RWP. The surveillance frequency will be established by the radiation protection manager.
- B. The above procedure shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr at 30 cm, but less than 500 rad/hr at 1 meter. In addition, locked or continuously guarded entryways shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the shift supervisor on duty and/or the radiation protection manager.

6.6 REPORTING REQUIREMENTS

The following reports shall be submitted in accordance with 10 CFR 50.4.

A. Occupational Radiation Exposure Report

An annual report covering the previous calendar year shall be submitted prior to April 30 of each year. The annual report shall

Deleted.

include a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, ^{1/} e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling.

The dose assignment to various duty functions may be estimates based on Self-Reading Dosimeter (SRD), TLD or film badge measurement. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources should be assigned to specific major work functions.

B. Monthly Operating Reports

← Deleted.

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the fifteenth of each month following the calendar month covered by the report. These reports shall include a narrative summary of operating experience during the report period which describes the operation of the facility.

C. Core Operating Limits Report

The core operating limits shall be established and documented in the Core Operating Limits Report (COLR) before each reload cycle or any remaining part of a reload cycle for the following:

1. The Average Planar Linear Heat Generation Rates (APLHGR) for Specifications 3.11.A and 3.6.G.1a,
2. The Minimum Critical Power Ratio (MCPR) for Specifications 3.11.C and 3.6.G.1a,
3. The Linear Heat Generation Rates (LHGR) for Specifications 2.1.A.1a and 3.11.B, and
4. The Power/Flow Exclusion Region for Specifications 3.6.J.1.a and 3.6.J.1.b.

The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

Report, E. E. Pilat, "Methods for the Analysis of Boiling Water Reactors Lattice Physics," YAEC-1232, December 1980 (Approved by NRC SER, dated September 15, 1982).

^{1/} This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20.

Attachment 3
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Docket No. 50-271

TECHNICAL SPECIFICATION PAGES (RE-TYPED)

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VYNPS

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3. A Radiation Protection individual qualified in radiation protection procedures (e.g., radiation protection technicians) with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and who will perform direct or remote (such as closed circuit TV cameras) periodic radiation surveillance at the frequency specified in the RWP. The surveillance frequency will be established by the radiation protection manager.

- B. The above procedure shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr at 30 cm, but less than 500 rad/hr at 1 meter. In addition, locked or continuously guarded entryways shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the shift supervisor on duty and/or the radiation protection manager.

6.6 REPORTING REQUIREMENTS

The following reports shall be submitted in accordance with 10 CFR 50.4.

- A. Deleted

B. Deleted

C. Core Operating Limits Report

The core operating limits shall be established and documented in the Core Operating Limits Report (COLR) before each reload cycle or any remaining part of a reload cycle for the following:

1. The Average Planar Linear Heat Generation Rates (APLHGR) for Specifications 3.11.A and 3.6.G.1a,
2. The Minimum Critical Power Ratio (MCPR) for Specifications 3.11.C and 3.6.G.1a,
3. The Linear Heat Generation Rates (LHGR) for Specifications 2.1.A.1a and 3.11.B, and
4. The Power/Flow Exclusion Region for Specifications 3.6.J.1.a and 3.6.J.1.b.

The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

Report, E. E. Pilat, "Methods for the Analysis of Boiling Water Reactors Lattice Physics," YAEC-1232, December 1980 (Approved by NRC SER, dated September 15, 1982).

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SUMMARY OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by ENO in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Commitments	Description	Completion Schedule
	Vermont Yankee will provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, 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 going forward from approval of this amendment will be provided using CDE).	60 days from the date of approval of the proposed amendment.