

Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

William R. Lagergren, Jr.
Site Vice President, Watts Bar Nuclear Plant

NOV 08 2004

WBN-TS-04-15

10 CFR 50.90

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

Gentlemen:

In the Matter of) Docket No. 50-390
Tennessee Valley Authority)

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - TECHNICAL SPECIFICATIONS (TS) CHANGE WBN-TS-04-15, APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO ELIMINATE REQUIREMENTS TO PROVIDE MONTHLY OPERATING REPORTS AND OCCUPATIONAL RADIATION EXPOSURE REPORTS USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP)

Pursuant to 10 CFR 50.90, TVA is submitting a request for a TS change (WBN-TS-04-15) to License NPF-90 for WBN Unit 1.

The proposed amendment would delete the TS requirements to submit monthly operating reports and annual 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 *Federal Register* on June 23, 2004, as part of the consolidated line item improvement process (CLIIP).

ADD1

U.S. Nuclear Regulatory Commission

Page 2

NOV 08 2004

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. Enclosure 3 provides the retyped TS pages with the changes.

In accordance with 10 CFR 50.91, a copy of this application, with enclosures is being provided to the Tennessee State Department of Health.

TVA requests approval of the proposed TS Change by June 1, 2005. This amendment will be implemented within 45 days of NRC approval.

Enclosure 4 provides the regulatory commitments contained in this letter. If you have any questions about this change, please contact P. L. Pace at (423)365-1824.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 8th day of November, 2004.

Sincerely,


W. R. Lagergren

Enclosures:

1. TVA Evaluation of the Proposed Changes
2. Proposed Technical Specifications Changes (mark-up)
3. Proposed Technical Specifications Changes (re-typed)
4. List of Regulatory Commitments

cc: See page 3

U.S. Nuclear Regulatory Commission
Page 3

NOV 08 2004

Enclosures

cc (Enclosures):

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Division of Radiological Health
Third Floor
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Nashville, Tennessee 37243-1532

ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY (TVA)
WATTS BAR NUCLEAR PLANT (WBN) UNIT 1
TECHNICAL SPECIFICATION WBN-TS-04-15
DOCKET NO. 390

DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Technical Specification (TS) 5.9.1 for an annual report on occupational radiation exposures and TS 5.9.4 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 5.9.1, Occupational Radiation Exposure Report | Deleted |
| TS 5.9.4, Monthly Operating Report | 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, Revision 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.

5.0 TECHNICAL ANALYSIS

TVA 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 SE and the supporting information provided to support TSTF-369. TVA has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to WBN Unit 1 and justify this amendment for the incorporation of the changes to the WBN TSs.

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.

6.1 Verification and Commitments

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

1. TVA will revise the UFSAR to make 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 will be provided using one or both systems [monthly operating reports and CDE]).
2. WBN has one operating reactor and one reactor under construction (Deferred).

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

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

8.0 ENVIRONMENTAL EVALUATION

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

9.0 PRECEDENT

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

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).

ENCLOSURE 2

**TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN) UNIT 1
TECHNICAL SPECIFICATION WBN-TS-04-15**

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

I. AFFECTED PAGE LIST

Unit 1

5.0-30

5.0-31

II. MARKED PAGES

See attached.

5.0 ADMINISTRATIVE CONTROLS

5.9 Reporting Requirements

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

5.9.1 ~~Occupational Radiation Exposure Report~~

~~NOTE~~

~~A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.~~

~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was required, 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, 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 personnel dosimetry measurements. Small exposures totaling < 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 shall be submitted by March 31 of each year following the year of initial criticality.~~

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5.9.2 Annual Radiological Environmental Operating Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

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.

(continued)

5.9 Reporting Requirements

5.9.2 Annual Radiological Environmental Operating Report (continued)

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 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. The report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result. 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.

5.9.3 Radioactive Effluent Release Report

-----NOTE-----
A single submittal may be made for a multiple unit station. The submittal should combine sections 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.

The Radioactive Effluent Release Report covering the operation of the unit 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 unit. 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 50, Appendix I, Section IV.B.1.

5.9.4 Monthly Operating Reports

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the pressurizer power operated relief valves or pressurizer safety valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

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ENCLOSURE 3

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN) UNIT 1
TECHNICAL SPECIFICATION WBN-TS-04-15

PROPOSED TECHNICAL SPECIFICATION CHANGES (REVISED)

I. AFFECTED PAGE LIST

Unit 1

5.0-30

5.0-31

II. REVISED PAGES

See attached.

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

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(continued)

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5.9.4 DELETED

(continued)

ENCLOSURE 4

**TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN) UNIT 1
TECHNICAL SPECIFICATION WBN-TS-04-15**

COMMITMENT LIST

TVA will revise the UFSAR to add a Regulatory Commitment to provide to 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 will be provided using one or both systems [monthly operating reports and CDE]).