



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT  
362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

NOV 15 2004

Docket No. 50-213  
CY-04-227

Re: 10 CFR 50.90

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Haddam Neck Plant  
Supplemental Information-Changes to Selected Radiological Requirements and  
Organizational Titles in Technical Specifications

In a letter dated January 9, 2004<sup>1</sup>, Connecticut Yankee Atomic Power Company (CYAPCO) proposed to amend its Operating License, DPR-61 by revising the Haddam Neck Plant (HNP) Technical Specifications. Among other changes proposed, a change to Technical Specifications 6.6.4.c and 6.6.3.a.2 was proposed to resolve a conflict between these specifications and Technical Specification 6.6.4.b. Technical Specification 6.6.4.b states that the Radioactive Effluent Controls Program (RECP) shall have limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas. These limitations shall conform to the pre-1994 concentration values in 10 CFR 20, Appendix B, Table II, Column 2. Use of pre-1994 10 CFR 20, Appendix B values is consistent with the HNP Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMDCM). In contrast, the current Technical Specification 6.6.4.c states that monitoring, sampling and analysis of radioactive liquid and gaseous effluents shall be in accordance with 10 CFR 20.1302. In the January Submittal, CYAPCO stated that compliance with this section would require use of the post 1994 10 CFR 20, Appendix B values and would not be in accordance with the HNP REMDCM. Therefore, it was proposed to replace the words "10 CFR 20.1302" to "pre-1994 10 CFR 20.106" in Technical Specifications 6.6.3.a.2 and 6.6.4.c.

However, during a discussion with the NRC Staff on November 8, 2004, the NRC indicated that the current 10 CFR 20.1302 allows to use of either pre-1994 10 CFR

<sup>1</sup> W. Norton (CYAPCO) letter to US NRC, "Haddam Neck Plant – Technical Specification Change Request – Changes to Selected Radiological Related Technical Specifications and Changes to Organizational Titles in Technical Specifications," dated January 9, 2004.

1004  
A001

20, Appendix B or post-1994 10 CFR 20 Appendix B values for monitoring, sampling and analysis of radioactive liquid and gaseous effluents. As such, changes to Technical Specifications 6.6.4.c and 6.6.3.a.2 are not required. CYAPCO concurs with the NRC Staff's position and is hereby withdrawing the above changes. CYAPCO has revised the affected pages of Technical Specifications to reflect the above conclusion and are submitted herewith in Attachment 1.

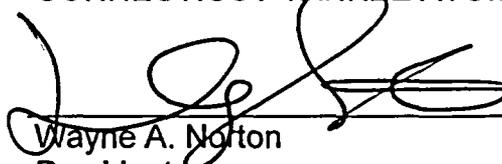
The proposed changes included in this submittal do not impact the previously submitted Significant Hazards Consideration (SHC) discussion (see SHC provided in Attachment 1 of CYAPCO's submittal dated January 9, 2004).

There are no regulatory commitments contained in this letter.

If you should have any questions regarding this submittal, please contact Mr. G. P. van Noordennen at (860) 267-3938.

Sincerely,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

  
Wayne A. Norton  
President

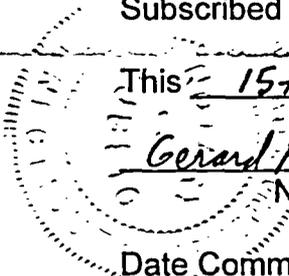
11/15/04  
Date

Attachment

cc: S. J. Collins, NRC Region I Administrator  
T. B. Smith, NRC Project Manager, Haddam Neck Plant  
R. R. Bellamy, Chief, Decommissioning and Laboratory Branch, NRC Region I  
E. L. Wilds, Jr., Director, CT DEP Monitoring and Radiation Division

Subscribed and sworn to before me

This 15th day of November 2004

  
Gerard P. van Noordenna  
Notary Public

Date Commission Expires: 12-31-07

Docket No. 50-213  
CY-04-227

Attachment 1

Haddam Neck Plan  
Supplemental Information-Changes to Selected Radiological Requirements and  
Organizational Titles in Technical Specifications  
Retyped HNP Technical Specifications Pages

November 2004

6.6 Programs and Manuals (continued)

---

6.6.3 Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODOCM)

The REMODOCM 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 and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program.

The REMODOCM shall also contain the Radioactive Effluent Controls and Radiological Environmental Monitoring Program required by Specifications 6.6.4 and 6.6.5, respectively, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required under Specifications 6.7.2 and 6.7.3.

Changes to the REMODOCM:

- a. Shall be documented and records of review shall be retained. This documentation shall contain:
  1. sufficient information to support each change together with the appropriate analyses or evaluations to justify the change; and
  2. a determination that each change maintains the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and that the change will not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after the change is independently reviewed in accordance with administrative procedures and approved by the designated manager or designee; and
- c. Shall be submitted to the NRC in the form of a complete legible copy of the entire REMODOCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change was made to the REMODOCM. A summary of each change shall be included.

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 (i.e., month and year) the change was implemented.

**6.6.4 Radioactive Effluent Controls Program**

This program conforms to 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 shall be contained in the REMODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determinations, in accordance with the methodology described in the REMODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to the pre-1994 concentration values in 10 CFR Part 20, Appendix B (to 20.1 to 20.602), Table II, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters described in the REMODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from the facility to unrestricted areas, conforming to 10 CFR Part 50, Appendix I;
- e. Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters described in the REMODCM performed at least every 92 days and determination of projected dose contributions from radioactive effluents in accordance with the methodology in the REMODCM performed at least every 92 days;
- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR Part 50, Appendix I;