

December 17 , 2004

Mr. Wayne Norton
President
Connecticut Yankee Atomic Power Company
362 Injun Hollow Road
East Hampton, Connecticut 06424-3099

SUBJECT: HADDAM NECK PLANT - ISSUANCE OF AMENDMENT RE: CHANGES TO
SELECTED RADIOLOGICAL TECHNICAL SPECIFICATIONS AND CHANGES
TO ORGANIZATIONAL TITLES (TAC NO. L60567)

Dear Mr. Norton:

The U. S. Nuclear Regulatory Commission (NRC) has issued the enclosed Amendment No. 200 to Facility Operating License No. DPR-61 for the Haddam Neck Plant (HNP). The amendment consists of changes to the Technical Specifications (TS) in response to your application dated January 9, 2004, (CY-04-022) as supplemented by your letter of November 15, 2004, (CY-04-227).

The amendment revises the following TSs in accordance with Technical Specification Task Force (TSTF) travelers 152, 258, and 308 (as applicable to HNP) to reflect changes in 10 CFR 20, "Standards for Protection against Radiation":

6.6.4, "Radioactive Effluent Controls Program"
6.7.1, "Occupational Radiation Exposure Report"
6.8, "High Radiation Area"

The amendment also revises TSs 6.1, 6.2.1, 6.4, 6.5 and 6.6 to reflect the use of generic titles in lieu of plant-specific personnel titles consistent with TSTF traveler 65.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Daniel M. Gillen, Deputy Director
Decommissioning Directorate
Division of Waste Management
and Environmental Protection
Office of Nuclear Material Safety
and Safeguards

Docket No. 50-213

Enclosures: 1. Amendment No. 200 to DPR-61
2. Safety Evaluation

cc w/encls: See next page

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Haddam Neck Plant

cc:

Mr. Allan Johanson, Assistant Director
Office of Policy and Management
Policy Development and Planning Division
450 Capitol Avenue - MS# 52ERN
P. O. Bo 341441
Hartford, CT 06134-1441

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Board of Selectmen
Town Office Building
Haddam, CT 06438

Mr. Wayne Norton
President
Connecticut Yankee Atomic Power Company
362 Injun Hollow Road
East Hampton, CT 06424-3099

Mr. Gerald Garfield,
CYAPCO General Counsel
Day, Berry, and Howard
City Place 1
Hartford, CT 06103-3499

Ms. Deborah B. Katz, President
Citizens Awareness Network
P. O. Box 83
Shelburne Falls, MA 01370-0083

Mr. R. M. Mitchell
Unit Manager
Connecticut Yankee Atomic Power Company
362 Injun Hollow Road
East Hampton, CT 06424-3099

Mr. T. W. Bennet, Jr.
Vice President and Chief Financial Officer
Connecticut Yankee Atomic Power Company
362 Injun Hollow Road
East Hampton, CT 06424-3099

Dr. E. L. Wilds, Jr., Director
Monitoring and Radiation Division
Connecticut Department of Environmental
Protection
79 Elm Street
Hartford, CT 06106-5127

Ms. Rosemary Bassilakis
Citizens Awareness Network
54 Old Turnpike Road
Haddam, CT 06438

Mr. Terry Schwennesen
Vice President and Director of
Generation Investments
New England Power Company
c/o National Grid
25 Research Drive
Westborough, MA 01582

Mr. Gerry P. van Noordennen
Regulatory Affairs Manager
Northeast Utilities Service Company
362 Injun Hollow Road
East Hampton, CT 06424-3099

Mr. Randall L. Speck
Kaye, Scholer, Fierman,
Hayes & Handler, LLP
The McPherson Building
901 Fifteenth Street, N.W., Suite 1100
Washington, D.C. 20005-2327

CONNECTICUT YANKEE ATOMIC POWER COMPANY

DOCKET NO. 50-213

HADDAM NECK PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 200
License No. DPR-61

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by the Connecticut Yankee Atomic Power Company (CYAPCO or the licensee) dated January 9, 2004 (CY-04-022), as supplemented on November 15, 2004 (CY-04-227) complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the rules and regulations of the Commission as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the regulations of the Commission;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the regulations of the Commission and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment; and paragraph 2.C.2 of Facility Operating License No. DPR-61 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 200 are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Daniel M. Gillen, Deputy Director
Decommissioning Directorate
Division of Waste Management
and Environmental Protection
Office of Nuclear Material Safety
and Safeguards

Attachment:
Changes to the Technical Specifications

Date of Issuance: December 17, 2004

ATTACHMENT TO LICENSE AMENDMENT NO. 200

FACILITY LICENSE NO. DPR-61

DOCKET NO. 50-213

Replace the following pages of the Appendix A Technical Specifications and the Bases for the Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

Insert

6.1

6.1

6.2

6.2

6.6-6.11

6.6-6.11

6.14

6.14

6.16-17

6.16-20

SAFETY EVALUATION BY
THE OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
RELATED TO AMENDMENT NO. 200
TO FACILITY LICENSE NO. DPR-61
CONNECTICUT YANKEE ATOMIC POWER COMPANY
HADDAM NECK PLANT
DOCKET NO. 50-213

1.0 INTRODUCTION

In its application dated January 9, 2004, as supplemented on November 15, 2004, the Connecticut Yankee Atomic Power Company (the licensee) requested changes to the Technical Specifications (TSs) for the Haddam Neck Plant to incorporate approved Technical Specification Task Force (TSTF) changes.

The proposed amendment would revise several TS to be consistent with approved TSTF travelers. Specifically, the proposed amendment would (1) revise TS 6.6.4, "Radioactive Effluent Controls Program" to incorporate TSTF-308 and TSTF-258; (2) revise TS 6.7.1, "Occupational Radiation Exposure Report" consistent with TSTF-152; and (3) revise TS 6.8, "High Radiation Area" to incorporate TSTF-258.

The amendment also revises TSs 6.1, 6.2.1, 6.4, 6.5 and 6.6 to reflect the use of generic titles in lieu of plant-specific personnel titles consistent with TSTF-65.

A no significant hazards consideration determination was published on March 30, 2004, in the *Federal Register* (69 FR 16617) for the application.

2.0 REGULATORY REQUIREMENTS

TSTFs are changes to Standard Technical Specifications that have been; proposed, made available for public comment, reviewed, evaluated and approved by NRC staff, and are now available for adoption in proposed plant-specific license amendment applications. Regulatory Issue Summary RS 00-006, dated March 20, 2000, describes the Consolidated Line Item Improvement Process (CLIP) for adopting standard TS changes for Power Reactors, licensees desiring to adopt specific TSTFs using the CLIP are required to verify through the license amendment process that proposed changes are applicable to their facilities.

3.0 ORGANIZATION OF THE SAFETY EVALUATION

This Safety Evaluation considers the applicability of the proposed TSTFs for the Haddam Neck Plant license in accordance with the CLIIP. Each proposed change is described briefly and the applicability of the TSTF and impacts of any variation from TSTFs are discussed.

4.0 TECHNICAL EVALUATION

A. Specification 6.6.4, Radioactive Effluents Control Program

Specification 6.6.4 identifies the elements of the licensee's program for control of radioactive effluents and minimizing doses to the public in accordance with 10 CFR 50.36a. The program is contained in the licensee's Radiological Effluent Monitoring and Offsite Dose Calculation Model (REMODCM).

1. The proposed change to paragraph 6.6.4.e coincides directly with approved TSTF-308, revision 1, dated June 13, 2000, with these two exceptions:
 - I. The Offsite Dose Calculation Model (ODCM) in the TSTF is identified as the REMODCM in the proposed TS change.
 - ii. The TSTF specifies determination of projected dose contributions from radioactive effluents every 31 days, while the proposed TS change specifies the dose determination every 92 days.

The REMODCM is the licensee's ODCM, and the 92 day determination time was a previously approved TS change. Therefore, the proposed TS change is applicable to the Haddam Neck Plant (HNP) and is acceptable.

2. The proposed new item after paragraph 6.6.4.j coincides directly with approved TSTF-258, revision 4, dated August 5, 2002, with the following exceptions:
 - I. "SR 3.0.2" in the TSTF is replaced with "Specification 4.0.2" in the proposed TS change.
 - ii. "SR 3.0.3" in the TSTF is replaced with "Specification 4.0.3" in the proposed TS change.

Specifications 4.0.2 and 4.0.3 are functionally equivalent to the Standard Technical Specification Surveillance (STS) Requirements SR 3.0.2 and 3.0.3 respectively. Therefore, the proposed TS change is applicable and acceptable.

B. Specification 6.8, High Radiation Area

The proposed revisions to specification 6.8 are consistent with TSTF-258, and would make the licensee's TS consistent with the current version of 10 CFR 20. The TSTF based proposed changes are:

1. New Specification 6.8.1.d.4 (ii) is proposed to provide an allowance for continuing with a job when communication is lost with a worker under certain conditions provided that the worker can communicate with other workers in the same area who are working on the same job and under same radiation work permit (RWP), and provided that the communications remain satisfactory between these workers and the Radiation Protection (RP) staff providing the remote surveillance.
2. New Specifications 6.8.1e and 6.8.2.e are proposed to provide an allowance to allow any individual or group of individuals to enter a high radiation area when accompanied by an individual qualified in radiation protection procedures with a radiation dose rate monitoring device.

The qualified individual is responsible for providing positive control and shall perform periodic radiation surveillance at the frequency specified in the RWP. Furthermore, these continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and job briefing does not require documentation prior to initial entry. This option provides adequate protection while, keeping with ALARA practices, minimizing exposure to the radiation protection qualified individual.

3. New Specification 6.8.2a is proposed to provide an allowance to allow "Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry..." This change is consistent with Regulatory Guide (RG) 8.38, Section 2.5, "Controls for High Radiation Areas (Control Points and Barriers)," which indicates that the use of a locked door or one control point, where positive control over personnel entry is exercised, is acceptable. Posting an individual to monitor a door provides positive controls over a high radiation area.
4. New Specification 6.8.2f is proposed to reword the current Specification 6.8.3 but it retains the current provision.

These changes coincide directly with approved TSTF-258 and are applicable to the HNP. Incorporation of the TSTF-258 language will also accomplish the following:

- A. Specification section titles have been added to separate requirements into two levels of high radiation areas; those with dose rates not exceeding 1.0 rem/hour and those for areas greater than 1.0 rem/hour. Also, the second title indicates that the dose rate is capped at less than 500rads/hour (at 1 meter) for areas with rates greater than 1.0 rem/hour to differentiate high from very high radiation areas.
- B. Clarify the different forms of self-reading dosimeters (e.g., pocket ionization chamber or electronic dosimeter) that can be used.

- C. Reference to specific titles have been removed and replaced by reference to a functional title or description.

These changes also coincide directly with approved TSTF-258, Revision 4. and are considered appropriate for the HNP. Therefore, the proposed changes to TS 6.8 are applicable and acceptable.

C. Specification 6.7.1, Occupational Radiation Exposure Report

The changes are being proposed for consistency with the current 10 CFR 20. These changes are based on TSTF-152, but the wording has not been directly incorporated. The proposed changes:

1. Replace the phrases "person-rem exposure" to "collective deep dose equivalent" and "total whole-body dose" to "total deep dose equivalent".
2. Specify that dose assignments can also be estimated using a pocket ionization chamber.

While the proposed revision to TS 6.7.1 does not use the exact TSTF-152, Revision 0. language, the changes are consistent with TSTF-152, and make the specification consistent with the current 10 CFR 20. Therefore, the proposed changes to TS 6.7.1 are applicable and acceptable.

D. Specifications 6.1, 6.2.1, 6.4, 6.5, and 6.6

In order to gain flexibility in making organizational changes without the need for a license amendment, CYAPCO proposes to replace specific titles in Section 6.0 of the HNP Technical Specifications with generic titles. These changes reflect the use of generic titles as provided by TSTS-65, Revision 1, and ANSI/ANS 3.1 in lieu of plant-specific personnel titles. The following changes are proposed:

1. Replace "VP Operations and Decommissioning" with "designated officer" in Sections 6.1.1 (page 6-1) and 6.2.1 .c (page 6-2).
2. Replace "Unit Manager" with "designated manager" in Sections 6.1.2 (page 6-1), 6.2.1.b (page 6-2), 6.4.1 (page 6-6), 6.5.2 and 6.5.3.c (page 6-7), 6.6.2b (page 6-8),and 6.6.3.b (page 6-9).
3. New Specification 6.1.4 is proposed to clarify the use of generic titles throughout the HNP Technical Specifications.

E. Conclusion

NRC Staff finds that the above proposed changes will not affect any HNP system, structure, or component. Therefore, the NRC staff concludes, consistent with the Consolidated Line Item Improvement Process, that the proposed amendment meets the NRC requirements, and the proposed amendment is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Connecticut State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (69 FR 16617 dated March 30, 2004). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22©)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Ted Smith
Duane Schmidt

Date: December 17, 2004