

ATTACHMENT B

PORC 04-37 Meeting Notes CY-OC-170-301, Rev 1, Oyster Creek Offsite Dose Calculation Manual

Presenter: B. Artz

50.59 Safety Evaluation Yes No

Disposition:

- Approval Recommended
- Approval Recommended with Conditions (see below)
- Remanded
- Review only

Summary of Changes:

Currently the ODCM requires reporting both the type of shipping container as well as identification of solidification agent in the Annual Radioactive Effluent Release Report. This ODCM revision deletes these two requirements. The ODCM revision deletes an unnecessary administrative task and brings our ODCM in line with Corporate Procedure CY-AA-170-2000, which also does not have the deleted requirements. The ODCM is also being revised to add / delete TLD locations due to some existing locations being inaccessible.

Summary of Safety Significance:

CY-OC-170-301 is an administrative document (Offsite Dose Calculation Manual) and this revision has no impact on nuclear safety, plant operations, or any design bases / safety analysis, as described in the UFSAR. A 10CFR50.59 Screening or Evaluation for this revision was not required. The revision was processed in accordance with procedure CY-AA-170-3100, Offsite Dose Calculation Manual Revisions.

Significant Questions / Comments by PORC, including Resolutions:

- (1) **PORC:** The ODCM deletes current shipping requirements. Verify that there are no existing Oyster Creek Commitments, which could impact these deletions.
Response: The Oyster Creek Commitment Tracking Database was checked and there are no existing commitments.

(2) PORC: Attachment 2 to CY-AA-170-3100 is missing the "Determination No."
Response: The "Determination No." has been added to the Attachment 2.

PORC Open Items:

None



Nuclear

ATTACHMENT 1
Procedure Approval Form
Page 1 of 1

AD-AA-101-1002
Revision 5

Document Number: CY-OC-170-301 Revision: 1

Title: Offsite Dose Calculation Manual for Ogishka Creek Generating Station

New Cancel Document Cancel Revision Revision Editorial Batch

EC#: _____ PCR#: _____ PPIS#: _____
ER#: _____ AR#: _____ #: _____

Supersede document(s) List: _____

Revision Summary:
Attach add'l descript. if req'd Delete reporting requirements for type of shipping containers

Originator: Bob Artz 08/27/04 OC/4006
Print Date Location/Ext

Applicable BR DR QC
Site Contacts BY LA CL
Check box and provide name PB OC Bob Artz LG
TMI ZN Other

Validation Req'd: No Yes (attach) Training Req'd: No Yes
(Validation requirement see AD-AA-101) Print/Signature

Change Management: HU-AA-1101 Change Checklist Attached Document Traveler None Required

Level of Use: Level 1 - Continuous Use Level 2 - Reference Use Level 3 - Information Use

Approval _____
CFAM (Standard Procedures) Print/Sign Date Location/Ext

Approval Location: O.C. Site Document(s) to be superseded: None
Use additional sheets as necessary. Assure that all pending changes are dispositioned.

Temp. Change Interim Change Temp or Interim Change #: _____

10CFR50.59 Applicable: No Yes Exempt per _____
(Or applicable regulatory process reviews)

10CFR72.48 Applicable: No Yes Tracking Number _____

PORC Required: No Yes 04-37 Cauley 9/30/04
PORC Number (after PORC Approved)

If superseding a document containing commitments, notify the Commitment Tracking Coordinator per LS-AA-110 so the CTD can be updated as appropriate.

SQR/ITR/RTTR N/A Req'd Reviews/Approval: Surveillance Coordinator Review Req'd No Yes
(list)

Cross Discipline Reviews

<u>Ervin Johnson</u> Print	<u>[Signature]</u> Signature	<u>8/30/04</u> Date	<u>ENGINEERING</u> Discipline or Org.
<u>Mike Ford</u> Print	<u>[Signature]</u> Signature	<u>9/15/04</u> Date	<u>CHEM</u> Discipline or Org.
<u>ANTHONY FARZNGA</u> Print	<u>[Signature]</u> Signature	<u>9/15/04</u> Date	<u>RWS</u> Discipline or Org.

Attach additional if req'd

Temp Change Authorization Only

SRO Print/Sign/Date	SQR Print/Sign/Date	Impl. Date	Exp. Date
SQR Approval indicates that all required Cross-Disciplinary reviews have been performed and the reviewers have signed this form. This procedure is technically and functionally accurate for all functional areas.			
SQR Approval: <u>Mike Ford</u> <u>9/15/04</u> Print/Sign/Date	<u>[Signature]</u> <u>9/15/04</u> Print/Sign/Date	<u>9/15/04</u> Date	<u>CHEM</u> Discipline or Org.
Site Authorization: <u>[Signature]</u> Print/Sign	<u>[Signature]</u> <u>10/18/2004</u> Print/Sign (when required by procedure) Date	<u>9/30/04</u> Date	<u>9/30/04</u> Impl. Date <u>10/12/04</u>

50.59 REVIEW COVERSHEET FORM

LS-AA-104-1001

Revision 1

Page 1 of 2

Station: Oyster CreekActivity/Document Number: CY-OC-170-301Revision Number: 1Title: Offsite Dose Calculation Manual for Oyster Creek Generating Station

NOTE: For 50.59 Evaluations, information on this form will provide the basis for preparing the biennial summary report submitted to the NRC in accordance with the requirements of 10 CFR 50.59(d)(2).

Description of Activity:

This activity is a revision of the Oyster Creek ODCM, procedure CY-OC-170-301. The changes are.

- Elimination of reporting requirement for type of shipping container
- Elimination of identification of solidification agent
- Adding TLD locations per Table 3.12.1-1
- Adding wording that allows for a variance from hanging REMP TLDs in inaccessible areas
- Revision of Table E-1: REMP Sample Locations to include new TLD Stations added to the program
- Revision of Figure E-1: REMP Sampling Locations Within 2 Miles
- Revision of Figure E-2: REMP Sampling Locations Beyond 2 Miles.

Reason for Activity:

This activity is being performed based upon CAP O2003-2206 Action 6. Section 6.2.2.6 of the ODCM requires reporting of type of shipping container for solid waste as well as the identification of solidification agent. The inclusion of the above two items eliminates an administrative task that is unnecessary as well as bringing Oyster Creek's ODCM in line with Corporate Procedure CY-AA-170-2000. In addition, the changes of the REMP TLD sample locations do not inhibit REMP monitoring program as five (5) additional TLD sampling locations were added to the REMP program.

Effect of Activity:

This change deletes an unnecessary administrative task from the Annual Radioactive Effluent Release Report. Corporate Procedure CY-AA-170-2000 "Annual Radioactive Effluent Release Report" has various requirements for the above report but does not require the types of shipping container nor the type of solidification agent. The inclusion of the REMP sample locations provides the procedure user with flexibility for TLD sampler locations in inaccessible locations. It also adds TLD locations to REMP sample stations. This enhances the procedure and this change does not in any way negatively impact plant operations, design bases, or safety analyses described in the UFSAR.

Summary of Conclusion for the Activity's 50.59 Review:

(Provide justification for the conclusion, including sufficient detail to recognize and understand the essential arguments leading to the conclusion. Provide more than a simple statement that a 50.59 Screening, 50.59 Evaluation, or a License Amendment Request, as applicable, is not required.)

Screening indicates that 50.59 is NOT applicable to the deletion of the shipping container and solidification agent requirement in the ODCM as well as addition of REMP sample locations. Question 8 in the Applicability Review Form was answered YES since this is a program controlled by the "...Technical Specifications (such as the ODCM). The Screening demonstrates a 50.59 Evaluation is not required. The procedure change may be implemented without prior NRC approval, as the intent of the procedure has not changed. However, in compliance with CY-AA-170-3100, "Offsite Dose Calculation Manual Revisions," the revised ODCM will be forwarded to the NRC with the submission of the next Annual Radiological Effluents Release Report.

Attachments:

Attach all 50.59 Review forms completed, as appropriate.

(NOTE: if both a Screening and Evaluation are completed, no Screening No. is required.)

50.59 APPLICABILITY REVIEW FORM

LS-AA-104-1002

Revision 1
Page 1 of 1Activity/Document Number: CY-OC-170-301 Revision Number: 1

Address the questions below for all aspects of the Activity. If the answer is yes for any portion of the Activity, apply the identified process(es) to that portion of the Activity. Note that it is not unusual to have more than one process apply to a given Activity. See Section 4 of the Resource Manual (RM) for additional guidance.

I. Does the proposed Activity involve a change:		
1. Technical Specifications or Operating License (10CFR50.90)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.1.1 of the RM
2. Conditions of License Quality Assurance program (10CFR50.54(a))? Security Plan (10CFR50.54(p))? Emergency Plan (10CFR50.54(q))?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.1.2 of the RM
3. Codes and Standards IST Program Plan (10CFR50.55a(f))? ISI Program Plan (10CFR50.55a(g))?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.1.3 of the RM
4. ECCS Acceptance Criteria (10CFR50.46)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.1.4 of the RM
5. Specific Exemptions (10CFR50.12)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.1.5 of the RM
6. Radiation Protection Program (10CFR20)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.1.6 of the RM
7. Fire Protection Program (applicable UFSAR or operating license condition)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.1.7 of the RM
8. Programs controlled by the Operating License or the Technical Specifications (such as the ODCM).	<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES	See Section 4.2.1.7 of the RM
9. Environmental Protection Program	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.1.7 of the RM
10. Other programs controlled by other regulations.	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.1 of the RM
II. Does the proposed Activity involve maintenance which restores SSCs to their original condition or involve a temporary alteration supporting maintenance that will be in effect during at-power operations for 90 days or less?		
	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.2 of the RM
III. Does the proposed Activity involve a change to the:		
1. UFSAR (including documents incorporated by reference) that is excluded from the requirement to perform a 50.59 Review by NEI 96-07 or NEI 98-03?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.3 of the RM
2. Managerial or administrative procedures governing the conduct of facility operations (subject to the control of 10CFR50, Appendix B)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.4 of the RM
3. Procedures for performing maintenance activities (subject to 10 CFR 50.65(a)(4))?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.4 of the RM
4. Regulatory commitment not covered by another regulation based change process (see NEI 99-04)?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.3/4.2.4 of the RM
IV. Does the proposed Activity involve a change to the Independent Spent Fuel Storage Installation (ISFSI) (subject to control by 10 CFR 72.48)		
	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	See Section 4.2.6 of the RM

Check one of the following:

- If all aspects of the Activity are controlled by one or more of the above processes, then a 50.59 Screening is not required and the Activity may be implemented in accordance with its governing procedure.
- If any portion of the Activity is not controlled by one or more of the above processes, then process a 50.59 Screening for the portion not covered by any of the above processes. The remaining portion of the activity should be implemented in accordance with its governing procedure.

Signoff:

50.59 Screener/50.59 Evaluator:
(Circle One)Bob Autz
(Print name)

Sign:

[Signature]
(Signature)Date: 08/23/09

50.59 SCREENING FORM

LS-AA-104-1003

Revision 1

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50.59 Screening No. OC-2004-S-0312

Rev. No. 0

Activity/Document Number: CY-OC-170-301

Revision Number: 1

I. 50.59 Screening Questions (Check correct response and provide separate written response providing the basis for the answer to each question)(See Section 5 of the Resource Manual (RM) for additional guidance):

- 1. Does the proposed Activity involve a change to an SSC that adversely affects an UFSAR described design function? (See Section 5.2.2.1 of the RM) ___ YES x NO
- 2. Does the proposed Activity involve a change to a procedure that adversely affects how UFSAR described SSC design functions are performed or controlled? (See Section 5.2.2.2 of the RM) ___ YES x NO
- 3. Does the proposed Activity involve an adverse change to an element of a UFSAR described evaluation methodology, or use of an alternative evaluation methodology, that is used in establishing the design bases or used in the safety analyses? (See Section 5.2.2.3 of the RM) ___ YES x NO
- 4. Does the proposed Activity involve a test or experiment not described in the UFSAR, where an SSC is utilized or controlled in a manner that is outside the reference bounds of the design for that SSC or is inconsistent with analyses or descriptions in the UFSAR? (See Section 5.2.2.4 of the RM) ___ YES x NO
- 5. Does the proposed Activity require a change in the Technical Specifications or Operating License? (See Section 5.2.2.5 of the RM) ___ YES x NO

II. List the documents (e.g., UFSAR, Technical Specifications, other licensing basis, technical, commitments, etc.) reviewed, including sections numbers where relevant information was found (if not identified in the response to each question).
ODCM (~~CY-AA-170-2000~~) Corporate Procedure CY-AA-170-2000 - "Annual Radioactive Effluent Release Report."
USFAR (See next page). CY-OC-170-301

III. Select the appropriate conditions:

- If all** questions are answered NO, then complete the 50.59 Screening and implement the Activity per the applicable governing procedure.
- If question 1, 2, 3, or 4 is answered YES and question 5 is answered NO, then a 50.59 Evaluation shall be performed.
- If questions 1, 2, 3, and 4 are answered NO and question 5 is answered YES, then a License Amendment is required prior to implementation of the Activity.
- If question 5 is answered YES for any portion of an Activity, then a License Amendment is required prior to implementation of that portion of the Activity. In addition, if question 1, 2, 3, or 4 is answered YES for the remaining portions of the Activity, then a 50.59 Evaluation shall be performed for the remaining portions of the Activity.

IV. Screening Signoffs:

50.59 Screener: Bob Antz
(Print name)

Sign: [Signature]
(Signature)

Date: 08/27/04

50.59 Reviewer: EVERETT JOHNSON
(Print name)

Sign: [Signature]
(Signature)

Date: 8/31/04

50.59 SCREENING FORM

LS-AA-104-1003

Revision 1

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50.59 Screening No.

OC-2004-S-0333

Rev. No.

0Activity/Document Number: CY-OC-170-301Revision Number: 1

1. The proposed activity, is a series of relatively minor revisions to the Oyster Creek Off Site Dose Calculation Manual – ODCM (CY-OC-170-301). The change deletes two reporting requirements for identifying shipping containers and identifying solidification agents. These requirements are not included in the Corporate Procedure CY-AA-170-301 – “Annual Radioactive Effluent Release Report.” In addition, this revision provides for a variance from locating REMP TLDs in the outer sectors that cannot be accessed due to a lack of an overland highway. Both NUREG 1302 and the Branch Technical Position provide for this variance if geological barriers prohibit TLD location. This change in no way changes the Annual Radioactive Effluent Release Report or any other requirement in the USFAR. Therefore, the activity does not involve a change that will adversely affect an UFSAR described SSC design function.
2. The proposed activity, the revision of the ODCM is a very minor change and merely brings Oyster Creek’s ODCM in line with Corporate Procedures, NUREG 1302 and the Branch Technical Position. It does not involve a change to a procedure that adversely affects how UFSAR described SSC design functions are performed or controlled. The deletion of a section that calls out solidification agent and the type of shipping container eliminates an administrative task. This revision also provides for a variance from locating REMP TLDs when the original location is inaccessible. Therefore, this activity in no way adversely affects how UFSAR described SSC design functions are performed or controlled.
3. The proposed activity, the revision of the Oyster Creek ODCM by eliminating shipping container reporting requirements and solidification agent is not delineated in the UFSAR and does not require revising or replacing an UFSAR described evaluation methodology that is used in establishing the design bases or used in safety analyses for a SSC.
4. Deletion of the above two reporting requirements, addition of REMP sampling locations, as well as providing a variance in hanging TLDs in inaccessible locations is neither an experiment nor a test as described in the UFSAR where the SSC is utilized or controlled in a manner that is outside the reference bounds of SSC design or is inconsistent with analyses or descriptions in the UFSAR.
5. The proposed activity is not discussed in the Technical Specifications although is discussed in the ODCM. This activity in no way alters or changes any other license requirement. Therefore, this activity will not require a change to either the Operating License or Technical Specifications.

References:**UFSAR**

- 1.9.24 Sampling and Analysis of Plant Effluents
- 2.1.1 Effluent Dose Limits
- 2.4.10 Release of Liquid Effluents
- 3.1.51 Release of Radioactive Materials to the Environment
- 3.1.54 Monitoring Fuel and Waste Storage
- 9.2.1.2.3 System Description of NRW and AOG
- 11.2.3.3 Dilution Factor for Radioactive Releases
- 11.5.2.2 Process Liquid Monitoring
- 1.9.17 Post Accident Sampling Capability
- Table 11.2.26 Population Doses from Liquid Effluents
- 11.3 Gaseous Waste Management System
- Table 11.3.12 Population Doses

The term “Solidification” is discussed extensively in Section 11.5. but not in the context of reporting the solidification agent as required in the “Annual Radioactive Effluent Release Report.”

**ATTACHMENT 2
ODCM Change Determination**

Station: Oyster CreekPage 1 of 4ODCM Revision No. 1Determination No. OC-2004-D-0001**I. Determination Questions (Check correct response)**

1. Does the ODCM change maintain the level of radioactive effluent control required by 10CFR20.1301? YES NO

Explain: (provide sufficient information including appropriate analyses justifying the ODCM change)

The document 10CFR20.1301 deals with dose limits to individual members of the public. Deleting the type of shipping containers and the type of solidification agents in no way affects dose to the public. Furthermore, deleting two (2) TLD field sampling stations and adding four (4) more stations has no effect on calculated dose to the public since these stations are REMP stations and dose to the public is not calculated with these stations.

2. Does the ODCM change maintain the level of radioactive effluent control required by 10CFR20.1302? YES NO

Explain: (provide sufficient information including appropriate analyses justifying the ODCM change)

10CFR20.1302 deals with compliance with dose limits for individual members of the public. As stated above these changes to the ODCM do not affect dose to the public as doses are not calculated using the REMP sampling TLDs.

3. Does the ODCM change maintain the level of radioactive effluent control required by 40CFR190? YES NO

Explain: (provide sufficient information including appropriate analyses justifying the ODCM change)

40CFR190 deals with radiation doses received by members of the public in the general environment and to radioactive materials introduced into the general environment as the result of operations that are part of a nuclear fuel cycle. It is an Environmental Protection Agency regulation. Again, doses to the General Public are not calculated by the above criteria.

4. Does the ODCM change maintain the level of radioactive effluent control YES NO

ATTACHMENT 2
ODCM Change Determination

required by 10CFR50.36a?

Explain: (provide sufficient information including appropriate analyses justifying the ODCM change)

10CFR50.36a deals with Technical Specifications on effluents from nuclear power reactors. The section also deals with the plant operator developing operating procedures for dealing with operating the radioactive waste system at the plant. More specifically, for effluents, 50.36a also deals with the Annual Radiological Effluents Report. The changes to the ODCM, while affecting the Annual Radiological Effluents Report in deleting the two requirements for shipping containers and solidification agents, in no way affect dose to the public.

5. Does the ODCM change maintain the level of radioactive effluent control required by Appendix I to 10CFR50? X YES NO

Explain: (provide sufficient information including appropriate analyses justifying the ODCM change)

10CFR50 Appendix I deals with offsite dose limits as calculated for the Annual Radiological Effluents Report. We are not changing the affected sections of the ODCM which are Section 3.11.2.1, which spells out the limits to whole body, skin and organ dose. Neither are we changing Section 3.11.2.2 which spells out annual air dose limits. Neither are we changing Section 3.11.2.3 which deals with dose due to radioactive iodine, tritium and particulates. Nor are we changing Section 3.11.4 which deals with calculated organ and total body doses from effluents.

**ATTACHMENT 2
ODCM Change Determination**Page 3 of 4

6. Does the ODCM change maintain the accuracy or reliability of effluent, dose, or setpoint calculations? YES NO

Explain: (provide sufficient information including appropriate analyses justifying the ODCM change)

Setpoint calculations are not being changed. Furthermore, dose calculations are performed by the SEEDS program, controlled by Procedure 820.4 and the changes to the ODCM do not involve any changes to these items.

7. Does the ODCM change maintain the accuracy of radioactive effluent control required by the SAR? YES NO

Explain: (provide sufficient information including appropriate analyses justifying the ODCM change)

The FSAR was searched and "hits" were obtained in the following sections but in no case were the changes being made to the ODCM contraindicating to accuracy of radioactive effluent control:

1.9.24 Sampling and Analysis of Plant Effluents

2.1.1 Effluent Dose Limits

2.4.10 Release of Liquid Effluents

3.1.51 Release of Radioactive Materials to the Environment

3.1.54 Monitoring Fuel and Waste Storage

9.2.1.2.3 System Description of NRW and AOG

11.2.3.3 Dilution Factor for Radioactive Releases

11.5.2.2 Process Liquid Monitoring

1.9.17 Post Accident Sampling Capability

Table 11.2.26 Population Doses from Liquid Effluents

11.3 Gaseous Waste Management System

Table 11.3.12 Population Doses

ATTACHMENT 2
ODCM Change Determination (example format)
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~~II. If all questions are answered YES, then complete the ODCM Change Determination and implement the Change per this procedure.~~

III. If any question is answered NO, then a change to the ODCM is not permitted

IV. Signoffs:

Determination Preparer: Bob Artz [Signature] Date: 09/29/04
(Printed Name) (Signature)

Reviewer: Lynn Newton [Signature] Date: 9/29/04
(Printed Name) (Signature)