

1.0 Environmental Monitoring

1.1 Non-Radiological Monitoring

1.1.1 Biotic - Aquatic

A. Fish Kill Monitoring Program

Objective

The objective of this program is to determine the species composition, abundance and distribution of station-induced fish kills due to winter shutdowns.

Specifications

After each Station shutdown, when the intake water temperature is below 8.5 degrees C (47.3 degrees F), visual inspections for fish shall be made along the shores of the discharge canal and the lower reaches of Oyster Creek within 24 hours of the initiation of the shutdown in accordance with the procedures prepared by the licensee per Section 3.4. A continuous temperature record shall be maintained through the 24-hour period after reaching cold shutdown.

Reporting Requirements

For planned shutdowns with the temperature of the intake water below 8.5 degrees C (47.3 degrees F), the NRC Region I office will be notified at least 24 hours in advance of such shutdown. This notification shall not be given for unplanned, automatic, or manual station trips.

If the shutdown results in greater than 100 fish killed and/or stressed, this event shall be reported to the NRC in accordance with Section 3.5.2.

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2.0 Special Monitoring And Study Activities

2.1 Unusual or Important Environmental Events

Environmental Monitoring Requirements

Unusual or important events are those that cause potentially significant environmental impact or that could be of public interest concerning environmental impact from station operation. The following are examples: on-site plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; fish kills in the vicinity of the site; unusually high impingement mortality episodes.

Action

Should an unusual or important event occur, the licensee shall make a non-routine prompt report to the NRC in accordance with the provisions of Subsection 3.5.2.

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report is not required. However, a follow-up written report is required in accordance with Subsection 3.5.2.

### 3.0 ADMINISTRATIVE CONTROL

This section describes administrative and management controls established by the Applicant to provide continuing protection to the environment and to implement the environmental technical specifications.

#### 3.1 Responsibility

Corporate responsibility for implementation of the Oyster Creek Environmental Technical Specifications and for assuring that plant operations are controlled in such a manner as to provide continuing protection of the environment has been assigned by the Chief Nuclear Officer to the Vice President - Oyster Creek.

The responsibility for conducting the studies as set forth in Section 1.1 (Non-Radiological Monitoring) and all of Section 2.0 (Special Monitoring and Study Activities) rests with the management position responsible for environmental affairs, who reports to the Vice President - Oyster Creek.

Administrative measures are defined in Section 3.3 which provide that the individual or group responsible for auditing or otherwise verifying that an activity has been correctly performed is independent of the individual or group responsible for performing the activity.

#### 3.2 Organization

Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including operating organization positions. Organizational charts will be documented in the Updated FSAR and updated in accordance with 10 CFR 50.71e.

#### 3.3 Review and Audit

Independent audit and review functions for environmental matters are the responsibility of the management position responsible for environmental affairs. This department is independent of line responsibility for the operation of the plant. The independent reviews and audits of the OCETS will be carried out by personnel from environmental affairs or by other AmerGen personnel, outside contractors or consultants at the request of the environmental affairs Personnel.

When individuals in the environmental affairs department of AmerGen perform any function relating to the OCETS other than independent audit and review, the Vice President - Oyster Creek will ensure that an independent review and audit of that work is performed by another individual in the environmental affairs department or some other who is not directly responsible for the specific activity being, reviewed and audited.

The audits and reviews will be performed as required by the Quality Assurance Topical Report (QATR).

Independent audits and reviews will encompass:

- A. Coordination of the OCETS with the safety technical specifications to avoid conflicts and maintain consistency.
- B. Compliance of station activities and operations with the OCETS.
- C. Adequacy of the programs and station procedures which are involved in ensuring the plant is operated in accordance with the OCETS.
- D. The proper functioning in accordance with the responsibilities listed in Section 3.1 of the OCETS.
- E. Proposed changes to the OCETS and the evaluation of the impacts resulting from the changes.
- F. Proposed written procedures, as described in Section 3.4.1 and proposed changes thereto which affect the environmental impact of the plant.
- G. Proposed changes or modifications to plant systems or equipment and a determination of the environmental impact resulting from the changes.
- H. Adequacy of investigations of violations of the OCETS and adequacy of and implementation of the recommendations to prevent recurrence of the violations.

### **3.4 Procedures**

- 3.4.1 Detailed written procedures, including applicable check lists and instructions, will be prepared and adhered to for all activities involved in carrying out OCETS.**

**3.5 Plant Reporting Requirements**

**3.5.1 DELETED**

### 3.5.2 Non-Routine Environmental Operating Reports

A prompt report shall be submitted in the event that an Unusual or Important Environmental Event occurs (as specified in Section 2.1). Such an occurrence will be reported within 24 hours to the NRC and within 30 days by a written report in accordance with 10 CFR 50.4. If an event is reportable under 10 CFR 50.72, then a duplicate immediate report is not required. However, a follow-up written report is required. The written report and, to the extent possible, the preliminary report shall (a) describe, analyze, and evaluate the occurrence, including the extent and magnitude of the impact; (b) describe the cause of the occurrence, and (c) indicate the corrective action, if necessary, taken (including any significant changes made in the procedures) to preclude repetition of the occurrence should the occurrence be station related.

### 3.5.3 Change in Environmental Technical Specifications

- A. A report shall be made to the NRC prior to implementation of a change in plant design, in plant operation, or in procedures described in Section 3.4, only if the change would have a significant adverse effect on the environment or involves an environmental matter or question not previously reviewed and evaluated by the NRC. The report shall include a description and evaluation of the changes and a supporting justification.
- B. Request for changes in environmental technical specifications shall be submitted in accordance with 10 CFR 50.90.
- C. Changes or additions to required Federal, and State permits and certificates for the protection of the environment that pertain to the requirements of OCETS shall be reported to the NRC within 30 days of approval by the appropriate permitting authority. In the event that the licensee initiates or becomes aware of a request for changes to any of the water quality requirements, limits or values stipulated in any certification or permit issued pursuant to Section 401 or 402 of the Federal Water Pollution Control Act (PL 92-500) which is also the subject of an OCETS reporting requirement, NRC shall be notified following approval by the authorizing agency. The notification to the NRC shall include an evaluation of the environmental impact of the revised requirement, limit or value being sought.

**3.6 Records Retention**

**3.6.1 Eighty (80%) percent data recovery annually for each environmental monitoring requirement is considered satisfactory for the purposes of the OCETS. The variability and uncertainty of environmental conditions demand allowance for some missed data in order to preclude an excessive reporting burden. This provision for missed data does not permit deliberate omission of sample collection or analyses but rather is meant to cover data missed due to circumstances beyond the control of the licensee, its representative or subcontractor. Records of the reasons for all missed data shall be retained with the data reports.**

**3.6.2 Records relative to the following areas will be retained until the date of termination of the Operating License.**

**A. Records and drawings detailing plant design changes made to systems and equipment as described in Section 3.5.3.**

**B. Records of all environmental surveillance data.**

**3.6.3 All other records relating to the environmental technical specifications will be retained for five years following recording.**