Entergy

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Michael J. Colomb
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BVY 09-051

August 26, 2009

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

SUBJECT: Technical Specifications Proposed Change No. 285
Revision of High Radiation Area Controls
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

Dear Sir or Madam:

In accordance with 10CFR50.90, Entergy Nuclear Operations, Inc. (ENO) is proposing to amend Operating License DPR-28 for Vermont Yankee Nuclear Power Station (VY). The proposed change would modify the VY Technical Specifications (TS) that governs administrative control of High Radiation Areas (HRA) to incorporate the HRA administrative controls contained within the Standard Technical Specifications, NUREG-1433, Revision 3.

ENO has reviewed the proposed amendment in accordance with 10CFR50.92 and concludes it does not involve a significant hazards consideration. In accordance with 10CFR50.91, a copy of this application, with attachments, is being provided to the State of Vermont, Department of Public Service.

Attachment 1 to this letter provides a detailed description and evaluation of the proposed change. Attachment 2 contains a markup of the current TS pages. Attachment 3 contains the retyped TS pages.

ENO requests review and approval of the proposed license amendment by September 1, 2010 and a 60 day implementation period from the date of the amendment approval.

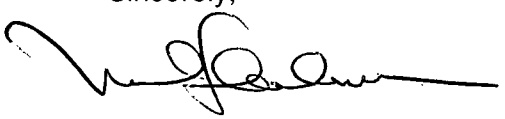
There are no new regulatory commitments made in this letter.

If you have any questions on this transmittal, please contact Mr. David Mannai at 802-451-3304.

A001
NRR

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 26, 2009.

Sincerely,



MJC/PLC

Attachments
1. Description and Evaluation of the Proposed Changes
2. Markup of the Current Technical Specifications Pages
3. Retyped Technical Specifications Pages

cc: Mr. Samuel J. Collins
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Mr. David O'Brien, Commissioner
VT Department of Public Service
112 State Street – Drawer 20
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Attachment 1

Vermont Yankee Nuclear Power Station

Proposed Change 285

Description and Evaluation of Proposed Changes

I. PURPOSE OF THE PROPOSED CHANGES

The proposed change to Vermont Yankee Nuclear Power Station (VY) Technical Specification (TS) Administrative Control 6.5 is as follows:

Administrative Control 6.5 "High Radiation Area" is proposed to be changed to modify the access controls for high radiation areas. The proposed change replaces the current access controls for high radiation areas with the access controls described in section 5.7 of NUREG-1433, Revision 3, "Standard Technical Specifications General Electric Plants, BWR/4." The NUREG-1433 high radiation area access controls more explicitly describe the requirements for entry into high radiation areas both for areas with dose rates less than 1.0 rem/hr and for those areas exceeding 1.0 rem/hr than the current access controls and also provide additional requirements and options for the control of these areas.

II. DESCRIPTION OF CHANGES

The proposed license amendment replaces the current access controls for high radiation areas with the access controls described in NUREG-1433.

Specifically, the changes proposed are:

1) Pages 257 and 258, Administrative Control 6.5 "High Radiation Area": This Administrative Control is being replaced with the high radiation area access controls of section 5.7 of NUREG-1433. Administrative Control 6.5.A, which describes the access controls for high radiation areas with dose rates less than 1.0 rem/hr, will be replaced in its entirety by section 5.7.1 of NUREG-1433. Administrative Control 6.5.B, which describes the access controls for high radiation areas with dose rates exceeding 1.0 rem/hr, will be replaced in its entirety by section 5.7.2 of NUREG-1433.

   For clarification and consistency with the definition of *high radiation area* in 10CFR20.1003, the lower bound of "greater than 0.1 rem/hr at 30 centimeters" is being added to the heading from section 5.7.1 of NUREG-1433. Additionally, the words "and/or" are being added to the wording from section 5.7.2.a.1 of NUREG-1433 to clarify that either the shift supervisor or radiation protection manager or both will have administrative control of the keys for locked high radiation areas.

III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGE

The TS administrative access controls for high radiation areas, section 6.5, are proposed to be replaced with those contained in section 5.7 of NUREG-1433 to provide additional requirements and options for the control of these areas. The federal regulatory requirements that establish the standards for protection against radiation are contained in 10CFR20. These regulations establish standards for protection against ionizing radiation resulting from activities conducted under licenses issued by the Nuclear Regulatory Commission. The purpose of the 10CFR20 regulations is in part to control activities in such a manner that the total dose to an individual does not exceed the limits established in 10CFR20. In addition, the programs for radiation protection strive to limit dose to a value that is as low as reasonably achievable.

The specific requirements relating to control of access to high radiation areas are provided in 10CFR20.1601. These regulations provide controls to ensure that access to these areas is controlled and that inadvertent entry is prohibited. This allows radiation protection personnel to establish requirements for personnel protection including contamination control and personnel monitoring. This ensures that personnel are aware of radiation hazards and that activities in these areas can be closely monitored and controlled.

Section 6.5 "High Radiation Area" of the VY TS provides requirements for control of access to high radiation areas that are consistent with 10CFR20. The proposed change replaces the current TS with the equivalent requirements from NUREG-1433 section 5.7 "High Radiation Area." Section 5.7 of NUREG-1433 satisfies the regulatory requirements for high radiation controls contained in 10CFR20. The proposed requirements provide additional options for controlling radiation areas including controls for individual high radiation areas that are within larger areas where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed. These requirements are not contained in the current TS and could be used to accommodate plant specific arrangements to ensure adequate protection of personnel.

The proposed amendment does not change any existing equipment operating requirements and does not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analysis. As such, there are no changes being made to safety analysis assumptions, safety limits or safety system settings that would adversely affect plant safety as a result of the proposed amendment.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

The proposed license amendment replaces the current Technical Specification administrative requirements, section 6.5, for high radiation area access control with the administrative access controls contained in section 5.7 of NUREG-1433, Revision 3, Standard Technical Specifications General Electric Plants, BWR/4."

Pursuant to 10CFR50.92, Entergy Nuclear Operations, Inc. has reviewed the proposed change and concludes that the change does not involve a significant hazards consideration since the proposed change satisfies the criteria in 10CFR50.92(c). These criteria require that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. The discussion below addresses each of these criteria and demonstrates that the proposed amendment does not constitute a significant hazard.

The proposed change does not involve a significant hazards consideration because:

1. The operation of Vermont Yankee Nuclear Power Station (VY) in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed amendment does not impact the operability of any structure, system or component that affects the probability of an accident or that supports mitigation of an accident previously evaluated. The proposed amendment does not affect reactor

operations or accident analysis and has no radiological consequences. The operability requirements for accident mitigation systems remain consistent with the licensing and design basis. Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The operation of VY in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

   The proposed amendment does not change the design or function of any component or system. No new modes of failure or initiating events are being introduced. Therefore, operation of VY in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The operation of VY in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

   The proposed amendment does not change the design or function of any component or system. The proposed amendment does not involve any safety limits, safety settings or safety margins. The TS administrative access controls for high radiation areas are being replaced with those contained in section 5.7 of NUREG-1433 to provide additional requirements and options for the control of these areas.

   Therefore, operation of VY in accordance with the proposed amendment will not involve a significant reduction in the margin to safety.

V. ENVIRONMENTAL CONSIDERATIONS

This amendment request meets the eligibility criteria for categorical exclusion from environmental review set forth in 10CFR51.22(c)(9) as follows:

(i) The amendment involves no significant hazards determination.

As described in Section IV of this evaluation, the proposed change involves no significant hazards consideration.

(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

The proposed amendment does not involve any physical alterations to the plant configuration that could lead to a change in the type or amount of effluent release offsite.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed amendment replaces the TS administrative access controls for high radiation areas, section 6.5, with the access controls contained in section 5.7 of

NUREG-1433. This proposed amendment does not change the dose rate levels used to define high radiation areas and will not increase individual or cumulative occupational radiation exposure.

Based on the above, VY concludes that the proposed change meets the eligibility criteria for categorical exclusion as set forth in 10CFR51.22(c)(9). Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

VI. REFERENCES

a) NUREG-1433, Revision 3, "Standard Technical Specifications General Electric Plants, BWR/4," dated March 2004.

Attachment 2

Vermont Yankee Nuclear Power Station

Proposed Change 285

Markup of the Current Technical Specification Pages

6.2 ORGANIZATION (Cont'd)

C. Unit Staff Qualifications

Each member of the unit staff shall meet or exceed the minimum qualifications of the American National Standards Institute N-18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants," except for the radiation protection manager who shall meet the qualifications of Regulatory Guide 1.8, Revision 1 (September 1975) and the shift engineer, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.3 ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDED

Applies to administrative action to be followed in the event a safety limit is exceeded.

If a safety limit is exceeded, the reactor shall be shutdown immediately.

6.4 PROCEDURES

Written procedures shall be established, implemented, and maintained covering the following activities:

A. Normal startup, operation and shutdown of systems and components of the facility.

B. Refueling operations.

C. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, suspected Primary System leaks and abnormal reactivity changes.

D. Emergency conditions involving potential or actual release of radioactivity.

E. Preventive and corrective maintenance operations which could have an effect on the safety of the reactor.

F. Surveillance and testing requirements.

G. Fire protection program implementation.

H. Process Control Program in-plant implementation.

I. Off-Site Dose Calculation Manual implementation.

6.5 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraphs 20.1601(a) and 20.1601(b) of 10 CFR 20:

INSERT 1

A. Paragraph 20.1601, "Control of Access to High Radiation Areas." In lieu of the "control device" or "alarm signal" required by Paragraph 20.1601(a), each high radiation area in which the intensity of radiation is greater than 100 mrem/hr at 30 cm, but less than 1000 mrem/hr at 30 cm, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Radiation Protection personnel qualified in radiation protection procedures (e.g., radiation protection technicians) may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

Any individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.

3. A Radiation Protection individual qualified in radiation protection procedures (e.g., radiation protection technicians) with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and who will perform direct or remote (such as closed circuit TV cameras) periodic radiation surveillance at the frequency specified in the RWP. The surveillance frequency will be established by the radiation protection manager.

INSERT 2

B. The above procedure shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr at 30 cm, but less than 500 rad/hr at 1 meter. In addition, locked or continuously guarded entryways shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the shift supervisor on duty and/or the radiation protection manager.

6.6 REPORTING REQUIREMENTS

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

A. Deleted

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20: GREATER THAN 0.1 REM/HR AT 30 CENTIMETERS, BUT

INSERT #1

~~5.7.1~~
A

High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation

1 a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

2 b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

3 c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

4 d. Each individual or group entering such an area shall possess:

a 1. A radiation monitoring device that continuously displays radiation dose rates in the area, or

b 2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

c 3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

d A. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

(i) 1. Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation ~~does~~ DOSE rates in the area; who is responsible for controlling personnel exposure within the area, or

5.7 High Radiation Area

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

Insert #1 (cont)

2. Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.

b. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7.2 B High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation

1 a. 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, and, in addition:

a 1. All such door and gate keys shall be maintained under the administrative control of the shift supervisor, radiation protection manager, or his or her designee. AND/OR

b 2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.

2 b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation ~~does~~ dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

3 c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

Insert #2

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

4 a. Each individual or group entering such an area shall possess one of the following:

a 1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

b 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or

c 3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

1 (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

2 (ii) Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.

4 a. In those cases where option (b 2) and (c 3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.

5 b. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

6.f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.

INSERT #2 CONT

Attachment 3

Vermont Yankee Nuclear Power Station

Proposed Change 285

Retyped Technical Specification Pages

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Each member of the unit staff shall meet or exceed the minimum qualifications of the American National Standards Institute N-18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants," except for the radiation protection manager who shall meet the qualifications of Regulatory Guide 1.8, Revision 1 (September 1975) and the shift engineer, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

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D. Emergency conditions involving potential or actual release of radioactivity.

E. Preventive and corrective maintenance operations which could have an effect on the safety of the reactor.

F. Surveillance and testing requirements.

G. Fire protection program implementation.

H. Process Control Program in-plant implementation.

I. Off-Site Dose Calculation Manual implementation.

6.5 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraphs 20.1601(a) and 20.1601(b) of 10 CFR 20:

A. High Radiation Areas with dose rates greater than 0.1 rem/hour at 30 centimeters, but not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation:

1. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

2. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

3. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

4. Each individual or group entering such an area shall possess:

   a. A radiation monitoring device that continuously displays radiation dose rates in the area, or

   b. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

   c. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

   d. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

      1. Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

      2. Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.

5. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

B. High Radiation Areas with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or from any surface penetrated by the radiation:

1. 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, and, in addition:

   a. All such door and gate keys shall be maintained under the administrative control of the shift supervisor, and/or radiation protection manager, or his or her designee.

   b. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.

2. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

3. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

4. Each individual or group entering such an area shall possess one of the following:

   a. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

   b. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or

   c. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

      1. Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

2. Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.

d. In those cases where option (b) and (c), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.

5. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

6. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.

6.6 REPORTING REQUIREMENTS

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

A. Deleted