

6.12 RESPIRATORY PROTECTION PROGRAM

ALLOWANCE

6.12.1 Pursuant to 10 CFR 20.103(c)(1) and (3), allowance may be made for the use of respiratory protective equipment in conjunction with activities authorized by the operating license for this facility in determining whether individuals in restricted areas are exposed to concentrations in excess of the limits specified in Appendix B, Table I, Column 1, of 10 CFR 20, subject to the following conditions and limitations:

- a. Except as provided in 6.12.1.c below, the limits provided in Section 20.103(a) and (b) shall not be exceeded.
- b. If the radioactive material is of such form that intake through the skin or other additional route is likely, individual exposures to radioactive material shall be controlled so that the radioactive content of any critical organ from all routes of intake averaged over 7 consecutive days does not exceed that which would result from inhaling such radioactive material for 40 hours at the pertinent concentration values provided in Appendix B, Table I, Column 1, of 10 CFR 20.
- c. For radioactive materials designated "Sub" in the "Isotope" column of Appendix B, Table I, Column 1 of 10 CFR 20, the concentration value specified is based upon exposure to the material as an external radiation source. For these materials the exposure limits of Section 20.101 shall apply rather than the concentration limits of 20.103(a) and (b). Individual exposures to these materials shall be limited, monitored and accounted for as part of the limitation on individual dose in 20.101. These materials shall be subject to applicable process and other engineering controls.

PROTECTION PROGRAM

6.12.2 In all operations in which adequate limitation of the inhalation of radioactive material by the use of process or other engineering controls is impracticable, the licensee may permit an individual in a restricted area to use respiratory protective equipment to limit the inhalation of airborne radioactive material, provided:

- a. The limits specified in 6.12.1 above, are not exceeded.
- b. Respiratory protective equipment is selected and used so that the peak concentrations of airborne radioactive material inhaled by an individual wearing the equipment do not exceed the pertinent concentration values specified in Appendix B, Table I, Column 1, of 10 CFR 20. For the purposes of this subparagraph, the concentration of radioactive material that is inhaled when respirators are worn may be determined by dividing the ambient airborne concentration by the protection factor

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ATTACHMENT B

APPLICATION FOR AMENDMENT TO  
OPERATING LICENSE

SAFETY EVALUATION

Consolidated Edison Company of New York, Inc.

Indian Point Unit No. 2

Docket No. 50-247

Facility Operating License No. DPR-26

July 30, 1975

## Safety Evaluation

Consolidated Edison requests a change to Section 6.12 of the Indian Point Unit No. 2 Technical Specifications. This change is proposed in order to remove any possible ambiguity from the Technical Specifications regarding the limitation of external exposures to airborne and gaseous radioactive materials. We believe this clarification is in keeping with the Commission's interpretation of the existing Technical Specifications, and is consistent with present regulations as applied, and with proposed changes in Part 20 of the Commission's regulations.

The present Technical Specifications contain a variance from the provisions of Section 20.103 of the Commission's regulations, pursuant to Sections 20.103(c) and 20.501. It is unclear, however, whether the specifications allow the quarterly exposure basis of Section 20.101 or the weekly concentration basis of Section 20.103 to be used for regulating work in areas where exposure to airborne and gaseous radioactive materials occurs. The proposed change would make it clear that the exposure limits of 20.101 apply and not the concentration limits of 20.103(a) and (b).

The proposed change does not in any way alter the safety or accident analyses performed for Indian Point Unit No. 2. No unreviewed safety questions, therefore, are created by this request. The proposed change has been reviewed by the

Station Nuclear Safety Committee and by the Consolidated Edison Nuclear Facilities Safety Committee. Both committees concur that this change does not represent a significant hazards consideration.