ATTACHMENT I TO IPN-99-079

SUPPLEMENTAL PROPOSED CHANGES TO ENVIRONMENTAL TECHNICAL SPECIFICATIONS

INCORPORATING RECOMMENDATIONS OF GENERIC LETTER 89-01

AND THE REVISED 10 CFR PART 20 AND 10 CFR PART 50.36a

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

INSTRUCTIONS FOR

ATTACHMENT I TO IPN-99-079

SUPPLEMENTAL PROPOSED CHANGES TO ENVIRONMENTAL TECHNICAL SPECIFICATIONS

INCORPORATING RECOMMENDATIONS OF GENERIC LETTER 89-01

AND THE REVISED 10 CFR PART 20 AND 10 CFR PART 50.36a

The attached pages should be used in lieu of those from Reference 1.
All other pages submitted with Reference 1 should be used as submitted.

Page submitted with Reference 1	Replace with attached page
1-7	1-7
6-20	6-20
6-21	6-21
6-22	6-22
4-5	4-5

1.24 SITE BOUNDARY

The SITE BOUNDARY (see Figure 1-1) means that line beyond which the land or property is not owned, leased, or otherwise controlled by either site licensee.

1.25 UNRESTRICTED AREA

An UNRESTRICTED AREA (see Figure 1-1) means an area, access to which is neither limited, nor controlled by either site licensee, but the UNRESTRICTED AREA does not include areas over water bodies. The concept of UNRESTRICTED AREAS, established at or beyond the SITE BOUNDARY, is utilized in the radioactive effluent controls to keep levels of radioactive materials in liquid and gaseous effluents as low as is reasonably achievable, pursuant to 10 CFR 50.36a.

b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

c. Records of facility radiation and contamination surveys.

d. Records of radiation exposure as required by 10 CFR 20.

e. Records of gaseous and liquid radioactive material released to the environs.

f. Records of transient or operational cycles for those facility components designed for a limited number of transient cycles.

g. Records of training and qualifications for current members of the plant staff.

h. Records of in-service inspections performed pursuant to these Technical Specifications.

i. Records of Quality Assurance activities required by the QA manual.

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the PORC and the SRC.

l. Records for Environmental Qualification which are covered under the provisions of paragraph 6.13.

m. Records of secondary water sampling and water quality.

n. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and records showing that these procedures were followed.

o. Records of service lives of all safety-related hydraulic snubbers including the date at which the service life commences and associated installation and maintenance records.

p. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.11 RADIATION AND RESPIRATORY PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure so as to maintain exposures as far below the limits specified in 10 CFR 20 as reasonably achievable. Pursuant to 10 CFR 20.1703, allowance may be made for the use of respiratory protection equipment in conjunction with activities authorized by the operating license for this plant in determining whether individuals in restricted areas are exposed to concentrations in excess of the limits specified in Appendix B, Table 1, Column 3 of 10 CFR 20.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.1601 of 10 CFR 20, each high radiation area in which the radiation level is greater than 100 mrem/hr** but less than 1000 mrem/hr** 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)*. Any individual or group of individuals permitted to enter such areas shall be provided or accompanied by one or more of the following:

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

b. 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 level in the area has been established and personnel have been made knowledgeable of them.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

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* Health Physics Personnel shall be exempt from the RWP issuance requirements for entries into high radiation areas during the performances of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

** Measured at 30 centimeters (12 inches) from radiation sources external to the body, or 30 centimeters (12 inches) from any surface that the radiation penetrates.

6.12.2* In addition to the requirements of 6.12.1 above, areas accessible to individuals with radiation levels such that an individual could receive in 1 hour a dose greater than 1000 mrem**, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the plant Radiological and Environmental Services Manager or his designee.

6.13 ENVIRONMENTAL QUALIFICATION

6.13.1 Environmental qualification of electric equipment important to safety shall be in accordance with the provisions of 10 CFR 50.49. Pursuant to 10 CFR 50.49, Section 50.49 (d), the EQ Master List identifies electrical equipment requiring environmental qualification.

6.13.2 Complete and auditable records which describe the environmental qualification method used, for all electrical equipment identified in the EQ Master List, in sufficient detail to document the degree of compliance with the appropriate requirements of 10 CFR 50.49 shall be available and maintained at a central location. Such records shall be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

6.14 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, Dated September 1995" as modified by the following exception:

a. ANS 56.8 - 1994, Section 3.3.1: WCCPPS isolation valves are not Type C tested.

The peak calculated primary containment internal pressure for the design basis loss of coolant accident, P_a, is 42.39 psig. The minimum test pressure is 42.42 psig.

The maximum allowable primary containment leakage rate, L_a, at P_a, shall be 0.1% of primary containment air weight per day.

Leakage acceptance criteria are:

a. Containment leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and C tests and $\leq 0.75\ L_a$ for Type A tests;

b. Air lock acceptance criteria are:

   1) Overall the air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$,

   2) For each door, leakage rate is $\leq 0.01\ L_a$ when pressurized to $\geq P_a$.

c. Isolation valves sealed with the service water system leakage rate into containment acceptance criterion is ≤ 0.36 gpm per fan cooler unit

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* Health Physics Personnel shall be exempt from the RWP issuance requirements for entries into high radiation areas during the performances of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

** Measured at 30 centimeters (12 inches) from radiation sources external to the body, or 30 centimeters (12 inches) from any surface that the radiation penetrates.

Amendment No. 11, 89 (Order dated October 24, 1980), 98, 101, 103, 116, 117, 162, 174

3. Shall be submitted to the Commission as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by marking in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

4.7 MAP DEFINING UNRESTRICTED AREAS FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS

Information regarding radioactive gaseous and liquid effluents, which will allow identification of structures and release points as well as definition of UNRESTRICTED AREAS within the SITE BOUNDARY that are accessible to MEMBERS OF THE PUBLIC, shall be shown in Figure 4.7-1.

The definition of UNRESTRICTED AREA used in implementing the Radiological Effluent Technical Specifications has been expanded over that in 10 CFR 20.1003. The UNRESTRICTED AREA does not include areas over water bodies. For calculations performed pursuant to 10 CFR Part 50.36a, the concept of UNRESTRICTED AREAS, established at or beyond the SITE BOUNDARY, is utilized in the Radiological Effluent Controls to keep levels of radioactive materials in liquid and gaseous effluents as low as is reasonably achievable.

ATTACHMENT II TO IPN-99-079

SAFETY EVALUATION OF

PROPOSED CHANGES TO ENVIRONMENTAL TECHNICAL SPECIFICATIONS

INCORPORATING RECOMMENDATIONS OF GENERIC LETTER 89-01

AND THE REVISED 10 CFR PART 20 AND 10 CFR PART 50.36a

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

Section I - Description of Changes

The Standards for Protection Against Radiation (10 CFR 20) have been revised by the Nuclear Regulatory Commission with mandatory compliance as of January 1, 1994 (Reference 4). The revised 10 CFR 20 provides as increase in the overall protection of the public safety and amounts to a redefinition of adequate protection based on developments in underlying radiation protection principles and scientific advancements of the last thirty years. The changes below are necessary to implement the revised 10 CFR 20 at Indian Point 3 Nuclear Station. Also, 10 CFR 50.36a (Reference 4) has been revised to allow an annual submittal for the Radioactive Effluent Release Report rather than semiannual, in response to Presidential memoranda on reducing regulatory burden. Therefore, Indian Point 3 Technical Specification references to the Semiannual Radioactive Effluent Release Report are being changed to the Annual Radioactive Effluent Release Report.

The changes also propose to revise Indian Point 3 Technical Specifications (Tech Specs or TS), Appendices A and B to the facility operating license, to implement the recommendations of NRC Generic Letter (GL) 89-01 (Reference 3). The proposed changes, outlined below, maintain the current level of radiological effluent control, and are consistent with the guidance provided by the generic letters and NUREG-1301 (Reference 5). The proposed changes, are presented and justified in the tables of Attachment III.

The changes implementing GL 89-01 include (1) relocating the procedural details involving radioactive effluent monitoring instrumentation, control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, and radiological environmental monitoring from the Radiological Environmental Technical Specifications (RETS contained in Part II of Appendix B to the operating license) to the appropriate section(s) of Appendix A, the Offsite Dose Calculation Manual (ODCM), or the Process Control Program (PCP) manual; (2) simplifying the reporting requirements specified in the Administrative Controls section of Appendix B, and relocating the details to the ODCM; (3) incorporating programmatic controls in the Administrative Controls section of Appendix A; (4) revising the administrative controls involving changes to the ODCM and PCP, including the addition of record retention requirements; and (5) updating and relocating the definitions of the ODCM and PCP. Specifications to remain in Appendix B include requirements for explosive gas monitoring instrumentation, limitations on the quantity of radioactivity in liquid effluent holdup tanks, and limitations on the explosive gas mixtures in the waste gas holdup system. The following Technical Specification changes implement GL 89-01:

- The definitions GASEOUS RADWASTE TREATMENT SYSTEM, PURGE - PURGING, SOURCE CHECK and VENTILATION EXHAUST TREATMENT SYSTEM are being relocated to the ODCM.

- The definitions OFFSITE DOSE CALCULATION MANUAL and PROCESS CONTROL PROGRAM are being updated and relocated to the ODCM;

- The definition SOLIDIFICATION is being relocated to the PCP;

- The radioactive liquid effluent monitoring instrumentation limiting conditions for operation

(LCO) and surveillance requirements (Appendix B, Technical Specifications 2.1 and 3.1, respectively) and the corresponding basis will be relocated to the ODCM;

- The radioactive gaseous effluent monitoring instrumentation LCO and surveillance requirements (Appendix B, Technical Specifications 2.2 and 3.2, respectively) and the corresponding basis will be relocated to the ODCM;

- The explosive gas monitoring instrumentation LCO and surveillance requirements (part of Appendix B, Technical Specifications 2.2 and 3.2, respectively) and the corresponding basis will remain in Appendix B but will be renumbered;

- The liquid effluent concentration LCO and surveillance requirements (Appendix B, Technical Specifications 2.3.1 and 3.3.1, respectively) and the corresponding basis will be relocated to the ODCM;

- The dose from liquid effluents LCO and surveillance requirements, (Appendix B, Technical Specifications 2.3.2 and 3.3.2, respectively) and the corresponding basis will be relocated to the ODCM;

- The liquid radwaste treatment system LCO and surveillance requirements, (Appendix B, Technical Specifications 2.3.3 and 3.3.3, respectively) and the corresponding basis will be relocated to the ODCM;

- The liquid holdup tanks LCO and surveillance requirements (Appendix B, Technical Specifications 2.3.4 and 3.3.4, respectively) and the corresponding basis will remain in Appendix B but will be renumbered;

- The gaseous effluent dose rates LCO and surveillance requirements (Appendix B, Technical Specifications 2.4.1 and 3.4.1, respectively) and the corresponding basis section will be relocated to the ODCM;

- The dose from noble gases LCO and surveillance requirements (Appendix B, Technical Specifications 2.4.2 and 3.4.2, respectively) and the corresponding basis will be relocated to the ODCM;

- The dose From iodine-131, tritium, and radionuclides in particulate form LCO and surveillance requirements (Appendix B, Technical Specifications 2.4.3 and 3.4.3, respectively) and the corresponding basis will be relocated to the ODCM;

- The gaseous radwaste treatment system LCO and surveillance requirements (Appendix B, Technical Specifications 2.4.4 and 3.4.4, respectively) and the corresponding basis will be relocated to the ODCM;

- The explosive gas mixture LCO and surveillance requirements (Appendix B, Technical Specifications 2.4.5 and 3.4.5, respectively) and the corresponding basis will remain in Appendix B but will be renumbered;

- The gas storage tanks LCO and surveillance requirements (Appendix B, Technical Specifications 2.4.6 and 3.4.6, respectively) and the corresponding basis will remain in Appendix B but will be renumbered;

- The solid radioactive waste LCO and surveillance requirements (Appendix B, Technical Specifications 2.5 and 3.5, respectively) and the corresponding basis will be relocated to the PCP;

- The total dose LCO and surveillance requirements (Appendix B, Technical Specifications 2.6 and 3.6, respectively) and the corresponding basis will be relocated to the ODCM;

- The radiological environmental monitoring program LCO and surveillance requirements (Appendix B, Technical Specifications 2.7 and 3.7, respectively) and the corresponding basis will be relocated to the ODCM;

- The land use census LCO and surveillance requirements (Appendix B, Technical Specifications 2.8 and 3.8, respectively) and the corresponding basis will be relocated to the ODCM;

- The interlaboratory comparison program LCO and surveillance requirements (Appendix B, Technical Specifications 2.9 and 3.9, respectively) and the corresponding basis will be relocated to the ODCM;

- Appendix B, Technical Specifications 5.1, 5.2, and 5.3.1 entitled Responsibilities, Procedures and Programs, and Special Reports, respectively, will remain in Appendix B but will be renumbered;

- Appendix B, Technical Specification 5.3.2, Routine Reports, will be simplified and the details regarding the contents of the Radioactive Effluent Release Reports and the Radiological Operating Reports will be relocated to the ODCM;

- Appendix B, Technical Specification 5.4, Record Retention, will remain in Appendix B but will be renumbered;

- Appendix B, Technical Specification 5.5, Process Control Program, will remain in Appendix B but will be renumbered;

- Appendix B, Technical Specification 5.6, Offsite Dose Calculation Manual, will remain in Appendix B but will be renumbered;

- Appendix B, Technical Specification 5.7, Major Changes to Radioactive Liquid, Gaseous and Solid Waste Treatment Systems, will remain in Appendix B but will be renumbered;

- Appendix B, Technical Specification 5.8, Map Defining Unrestricted Areas For Radioactive Gaseous and Liquid Effluents, will remain in Appendix B but will be renumbered;

- Appendix A, Technical Specification 6.8 is being revised to include procedural and control

requirements for the Radioactive Effluent Control and the Radiological Environmental Monitoring Programs;

- Appendix A, Technical Specification 6.9.2 is being revised to reference the new administrative controls outlined in Appendix A, Technical Specification 6.8.4, and to add special reporting requirements for inoperable explosive gas monitoring instrumentation;

- Appendix A, Technical Specification 6.10.2 is being revised to include retention requirements of reviews performed for ODCM and PCP changes.

The ODCM will be divided into two sections: Part I will contain the information being relocated from the RETS and will be known as Radiological Effluent Controls (REC); Part II will contain the information currently contained in the ODCM.

The implementation of the revised 10 CFR Part 20 includes updating definitions, revising high radiation area controls, and updating references to 10 CFR 20.1 through 20.602 with the corresponding references to 20.1001 through 20.2402. The following Technical Specification changes implement the revised 10 CFR Part 20:

- The definition MAXIMUM PERMISSIBLE CONCENTRATION (MPC) is being replaced with the definition EFFLUENT CONCENTRATION.

- The definitions MEMBER(S) OF THE PUBLIC, SITE BOUNDARY and UNRESTRICTED AREA are being updated.

- The definition PROCESS CONTROL PROGRAM is being updated to reference the applicable Part 20 sections.

- New Appendix A Technical Specification 6.8.4.a.7 cites specific values from the revised Part 20 Appendix B Tables.

- Appendix A, Technical Specification 6.9.1.3 is being updated to reference the applicable Part 20 sections.

- Appendix A, Technical Specification 6.10.2.d is being updated to be consistent with 10 CFR 20.

- Appendix A, Technical Specifications 6.12.1 and 6.12.2 are being updated to be consistent with 10 CFR 20.

- Appendix B, Technical Specifications 2.3.1, and 2.6 are being updated to reference the applicable Part 20 sections.

- Appendix B, Technical Specification Bases for Radioactive Liquid Effluent Monitoring Instrumentation, Gaseous Effluent Monitoring Instrumentation, and Liquid Effluents Concentration are being revised in order to accomodate needed operational flexibility to facilitate implementation of the revised 10 CFR 20 requirements and to update references

to Part 20 sections.

- Appendix B, Technical Specification Bases for Liquid Holdup Tanks are being updated to reference the applicable Part 20 sections.

- Appendix B, Technical Specification Bases for Total Dose are being updated to reference the applicable Part 20 sections.

- Appendix B, Technical Specification Bases for Gaseous Effluent Dose Rate are being extensively revised in order to accomodate needed operational flexibility to facilitate implementation of the revised 10 CFR 20 requirements.

- Appendix B, Technical Specification 5.8 and Figure 5.1-1 are being updated to reflect revised definitions and to reference the applicable Part 20 sections.

Other editorial changes include:

- Definitions for all terms appearing in UPPER CASE in either Appendix A or Appendix B will be located in the Appendix A Definition section. Specifically, definitions OFFSITE DOSE CALCULATION MANUAL, PROCESS CONTROL PROGRAM, EFFLUENT CONCENTRATION, MEMBER(S) OF THE PUBLIC, SITE BOUNDARY, and UNRESTRICTED AREAS are being added to Appendix A.

- The definitions ACTION, CHANNEL CALIBRATION, CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, LIQUID RADWASTE TREATMENT SYSTEM, OPERABLE - OPERABILITY RATED THERMAL POWER, and THERMAL POWER are being added to the ODCM (rather than being relocated from Appendix B as with the other definitions).

- The definition VENTING is being deleted from the Technical Specifications.

- Procedural controls for the PCP are being added to Appendix A, Technical Specification 6.8.

- The detailed routine reporting requirements currently contained in Appendix B and being relocated to the ODCM are being reformatted.

- A new Special Reports section is being added to the ODCM.

- Other editorial changes are being made, including the reformatting and renumbering of Technical Specifications to remain in Appendix B.

- The Table of Contents, List of Tables, List of Figures are being revised to reflect all of the proposed changes.

Section II - Evaluation of Changes

DISCUSSION

The proposed changes implementing GL 89-01, the revised 10 CFR 20 and 10 CFR 50.36a involve 1) combining related LCO and surveillance requirements from Sections 2.0 and 3.0, respectively, of the Indian Point 3 (IP3) RETS and relocating this text to the new Radiological Effluent Controls (REC) section of the ODCM, 2) relocating the bases contained in Section 4.0 of the RETS to the ODCM REC, 3) relocating the detailed reporting requirements contained in Section 5.0 of the RETS to the ODCM REC, and 4) updating references to 10 CFR Part 20. Additional changes include formatting both the remaining RETS and the new REC to more closely model Standard Technical Specifications (STS), revising the frequency of the Radioactive Effluent Release Report in accordance with 10 CFR 50.36a, relocating definitions to Appendix A of the Technical Specifications and adding/deleting definitions as necessary, and adding a new Special Reports section to the ODCM.

The ODCM REC will be created as follows:

- The RETS Section 2 "OBJECTIVE" paragraphs are being deleted and the "SPECIFICATION" paragraphs are being spilt into "CONTROL(S)" and "ACTION(S)" paragraphs.

- The RETS Section 3 "APPLICABILITY" and "OBJECTIVE" paragraphs are being deleted and the text from the "SPECIFICATION" paragraphs is being relocated to immediately follow the "ACTION(S)" paragraphs.

- The routine reporting section contained in Section 5.0 of the RETS will be simplified, in accordance with GL 89-01, and remain in Appendix B.

- The detailed reporting requirements are being relocated to the ODCM REC in a new format which uses bullets. The new format helps to identify the information required in the reports and is easier to read than the current narrative format.

- A new Special Reports section is being added listing all of the special reporting requirements contained in the ODCM. These special reports are required by Appendix A Technical Specification 6.9.2.g and i.

The Radiological Environmental Technical Specifications (RETS) to remain in Appendix B are consistent with the guidance provided by GL 89-01. As with the proposed REC, the format is being changed to more closely model STS. The current Section 2 "OBJECTIVE" paragraphs are being deleted and the "SPECIFICATION" paragraphs are being spilt into "LCO" and "ACTION(S)" paragraphs. The Section 3 "APPLICABILITY" and "OBJECTIVE" paragraphs are being deleted and the text from the "SPECIFICATION" paragraph is being relocated to immediately follow the "ACTION(S)" paragraphs. The bases will remain and, as previously discussed above, the routine reporting section has been simplified.

The addition of Appendix A Technical Specification 6.8.4 follows the model Technical Specifications

provided by GL 89-01.

Tables 1 through 5 in Attachment III identify the proposed changes. Table 1 identifies the changes to the text being relocated from the RETS to the ODCM REC in the order of appearance in the REC. The REC is a revised copy of the RETS. Table 2 identifies the changes to the PCP. Table 3 identifies the changes to Appendix A Technical Specifications. Table 4 identifies the changes to the Technical Specifications to remain in Appendix B. Table 5 identifies miscellaneous changes not fitting into the above categories. Attachment VI provides a markup copy of the ODCM, PCP, and Technical Specifications, Appendices A and B, with removed text lined out and new text in boldface font.

JUSTIFICATION

Justification for changes is provided in the tables of Attachment III. The GL 89-01 changes are consistent with the guidance provided in the generic letter and NUREG-1301, or are editorial. Editorial changes include the relocation of text, correction of typographical and punctuation errors, renumbering, reformatting, immaterial wording revisions/deletions/clarifications which do not change intent, and updating references.

Revising the submittal frequency of the Radioactive Effluent Release Report from semiannual to annual is an administrative change to be consistent with the requirements of the revised 10 CFR 50.36a. The annual submittal of the Radioactive Effluent Release Report is in accordance with report submittal frequency stipulated in 10 CFR 50.36a. It is an administrative change and as such, has no impact on plant equipment or methods of operation. Where they occur, TS references to the Semiannual Radioactive Effluent Release Report have been changed to Annual Radioactive Effluent Release Report.

Justifications for the proposed changes regarding 10 CFR 20 include:

MEMBER(s) OF THE PUBLIC is not defined in the old 10 CFR 20. The revised 10 CFR 20.1003 defines MEMBER(s) OF THE PUBLIC as "any individual except when that individual is receiving an occupational dose." The proposed change incorporates this definition. This change is required for compliance with the revised 10 CFR 20 and will not affect the safe operation of the plant or create a new radiological hazard to plant personnel or the public.

The current definition of SITE BOUNDARY AREA is revised to reference Figure 1-1, Map Defining Unrestricted Areas for Radioactive Gaseous and Liquid Effluents. In addition, the definition as revised to incorporate wording from 10 CFR 20.1003 in that an unrestricted area is "an area, access to which is neither limited or controlled by the licensee." The revised definition maintains the current Technical Specification wording that the unrestricted area "does not include areas over water bodies." This change clarifies the current definition and will not impose a new radiological hazard to the plant staff or the public.

The proposed change to the liquid concentration release limit is being made in order to accommodate needed operational flexibility to facilitate implementation of the new 10 CFR 20 requirements.

The basic requirements for Technical Specifications (TS) concerning effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent TS will keep average annual releases of radioactive material in effluents to small percentages of the limits specified in the old 10 CFR 20.106 (new 10 CFR 20.1302). These requirements further indicate that operational flexibility is allowed , compatible with considerations of health and safety, which may temporarily result in releases higher than such small percentages, but still within the limits specified in the old 10 CFR 20.106 which references Appendix B, Table II maximum permissible concentrations (MPCs). These referenced concentrations are specific values which relate to an annual dose of 500 mrem. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be exerted to keep levels of radioactive materials as low as reasonably achievable (ALARA) as set forth in 10 CFR 50, Appendix I.

As stated in the Introduction to Appendix B of the new 10 CFR 20, the liquid effluent concentrations (EC) limits given in Appendix B, Table 2, Column 2, are based on an annual dose of 50 mrem. Since a release concentration corresponding to a limiting dose rate of 500 mrem/year has been acceptable as a TS limit for liquid effluents, which applies at all times as an assurance that the limits of 10 CFR 50, Appendix I are not likely to be exceeded, it should not be necessary to reduce this limit by a factor of 10.

Operational history at Indian Point 3 has demonstrated that the use of concentration values associated with the old 10 CFR 20.106 as TS limits has resulted in calculated maximum individual doses to a member of the public that are small percentages of the limits of 10 CFR 50, Appendix I. Therefore, the use of concentration values which correspond to an annual dose of 500 mrem (ten times the concentration values stated in the new 10 CFR 20, Appendix B, Table 2, Column 2) should not have a negative impact on the ability to continue to operated within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

Having sufficient operational flexibility is also important in establishing a basis for effluent monitor set point calculations. As discussed above, the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, relate to a dose of 50 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate to 50 mrem/yr. The concentrations associated with this low value are impractical to base effluent monitor set point calculations for many liquid concentration release situations when monitor background, monitor sensitivity, and monitor performance must be taken into account.

To accommodate operational flexibility needed for effluent releases, the limits associated with the liquid concentration release rate TS are based on ten times the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, to apply at all times. The multiplier of ten is proposed because the annual dose of 500 mrem, on which the concentrations in the old 10 CFR 20, Appendix B, Table II, Column 2 are based, is a factor of 10 higher than the annual dose of 50 mrem, that the concentrations in the new 10 CFR 20, Appendix B, Table 2, Column 2, are based.

Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I, and 40 CFR 190.

The proposed change to the gaseous release rate limit is being made in order to accommodate operational flexibility to facilitate implementation of the new 10 CFR 20 requirements. As stated

in the Introduction to Appendix B of the new 10 CFR 20, the gaseous EC limits given in Appendix B, Table 2, Column 1, are based on an annual dose of 50 mrem for isotopes for which inhalation or ingestion is limiting, or 100 mrem for isotopes for which submersion (noble gases) is limiting. Release concentrations corresponding to limiting dose rates at the site boundary from noble gases less than or equal to 500 mrem/yr to the whole body and 3000 mrem/yr to the skin; and 1500 mrem/yr to any organ from Iodine-131, tritium and all radionuclides in particulate form with half lives greater than eight days have been acceptable as TS limits for gaseous effluents to assure that limits of 10 CFR 50, Appendix I, and 40 CFR 190 are not likely to be exceeded. It should not be necessary to restrict operational flexibility by incorporating the dose rate limit associated with EC value for isotopes based on inhalation/ingestion (50 mrem/yr) or the dose rate associated with EC value for isotopes based on submersion (100 mrem/yr).

Having sufficient operational flexibility is also important in establishing a basis for effluent monitor set point calculations. As discussed above, the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 1, relate to a dose of 50 or 100 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate of 50 or 100 mrem/year. The concentrations associated with these low values are impractical upon which to base effluent monitor set point calculations for many gaseous release situations when monitor background, monitor sensitivity, and monitor performance must be taken into account.

To accommodate operational flexibility needed for effluent releases, the limit associated with gaseous release rate TS will be maintained at the current instantaneous dose rate limit for noble gases of 500 mrem/yr to the whole body and 3000 mrem/yr to the skin, and for Iodine-131, for tritium, and for all radionuclides in particulate form with half lives greater than eight days, an instantaneous dose rate limit of 1500 mrem/yr to any organ.

Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I, and 40 CFR 190. Operational history at Indian Point 3 has demonstrated that the use of the dose rate values listed above (i.e., 500, 3000, and 1500 mrem/yr) as TS limits has resulted in calculated maximum individual doses to a member of the public that are small percentages of the limits of 10 CFR 50, Appendix I.

IP3 TS section 6.10.2.d requires exposure records be maintained for the duration of the operating license for all individuals entering radiation control areas. IP3 proposes to amend the record-keeping requirement to retain exposure records "as required by 10 CFR 20." Neither the old revision of 10 CFR 20 nor the new revision requires exposure records be maintained for all individuals who enter a radiation control area. The new 10 CFR 20.2106 (a) requires licensees to "maintain records of doses received by individuals for whom monitoring is required pursuant to 10 CFR 10.1502 and records of doses received during planned special exposures, accidents, and emergency conditions." 10 CFR 20.2106(f) requires the licensee to "retain each required form or record until the Commission terminates the pertinent license requiring the record." Entrance into a radiation control area is not included int the criteria requiring individual monitoring listed in 10 CFR 20.1502. IP3 will continue to comply with the monitoring, reporting and record keeping criteria of 10 CFR 20. This change will not create a new radiological hazard to plant personnel or the public.

Changes are necessary to reflect the requirements of the revised 10 CFR 20 references and

terminology:

a) Administrative changes are being made to reflect that the requirements in the old 10 CFR 20.106 are low located in the new 10 CFR 20.1302 for monitoring, sampling, and analysis of liquid and gaseous effluents.

b) Footnote 1 in IP3 TS section 6.9.1.2 explains the required tabulation which supplements the requirements of 10 CFR 20.407. The reference to 10 CFR 20.4078, regarding personnel monitoring reports in being changed to incorporate the corresponding paragraph in the revised rule, 10 CFR 20.2206. This is an administrative change necessary to implement the requirements of the new 10 CFR 20 and does not reduce the reporting requirements in 6.9.1.3. No new radiological hazard is created by this change.

c) IP3 TS section 6.12 lists the requirements for posting and controlling access to high radiation areas. These requirements are an approved alternate method of control as required by 10 CFR 20.203(c)(5) and 10 CFR 20.1601(c). 10 CFR 20.203 (c)(2) lists the controls that must be in place at the entrance or access point to a high radiation area. The corresponding paragraph(s) to 10 CFR 20.203(c)(2) in the new rule are 10 CFR 20.160(a). The requirements for the control device referenced in 10 CFR 20.203(c)(2) and 10 CFR 20.1601(a) are essentially the same. IP3 will continue using the approved alternate method of controlling access to High Radiation areas as per TS 6.12.1 in lieu of the "control device" or "alarm s nal" required by 10 CFR 20.1601(a). This change will not decrease the ability of IP3 radiation protection programs to provide control of exposure from external sources in restricted areas. Changing the paragraph reference to correspond to the new 10 CFR 20 is an administrative change only. In addition, a footnote specifying that the distance at which radiation measurements are made in high radiation areas is 30 centimeters (12 inches) as required by the new 10 CFR 20.1601(a) will not create a new radiological hazard to plant personnel or the public.

d) An Administrative change is being made to IP3 Technical Specification Basis Appendix B, Section 3.0 to revise the reference to the old 10 CFR 20, Appendix B, Table II, Column 2, the new 10 CFR 20, Appendix B, Table 2, Column 2. The limit for the liquid holdup tanks will remain unchanged at 10 Curies, excluding tritium and dissolved or entrained noble gases. This limit is consistent with guidance contained in NUREG-0133, which states that the Curie limit for a temporary liquid storage tank be less than or equal to 10 Curies, excluding tritium and dissolved or entrained noble gases.

These changes do not result in a change in the types or amounts of effluents released. The changes do not impact the operation, design, configuration, or testing of plant structures, systems or components. The changes are being made in accordance with NRC guidance and continue to assure compliance with the applicable regulatory requirements.

Section III - No Significant Hazards Evaluation

In accordance with the requirements of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

1. **Does the proposed license amendment involve a significant increase in the probability or consequences of any accident previously evaluated?**

A. The proposed changes involve 1) combining related LCO and surveillance requirements from Sections 2.0 and 3.0, respectively, of the Indian Point 3 (IP3) RETS and relocating this text to the new Radiological Effluent Controls (REC) section of the ODCM, 2) relocating the bases contained in Section 4.0 of the RETS to the ODCM REC, 3) relocating the detailed reporting requirements contained in Section 5.0 of the RETS to the ODCM REC, and 4) updating references to 10 CFR Part 20. Additional changes include formatting both the remaining RETS and the new REC to more closely model Standard Technical Specifications (STS), revising the frequency of the Radioactive Effluent Release Report in accordance with 10 CFR 50.36a, relocating all definitions to Appendix A of the Technical Specifications and adding/deleting definitions as necessary, and adding a new Special Reports section to the ODCM. Most of the changes are 1) consistent with the guidance provided in the generic letter, NUREG-1301, or provisions of 10 CFR; or 2) editorial. Editorial changes include the relocation of text, correction of typographical and punctuation errors, renumbering, reformatting, immaterial wording revisions/deletions/clarifications which do not change intent, and updating references.

B. The proposed revisions to the liquid and gaseous release rate limits, the relocation of the old 10 CFR 20.106 requirements to the new 10 CFR 20.1302, and the revision to the TS bases for the Liquid Holdup Tank activity will involve no change in the types or amounts of effluents that will be released, nor will there be an increase in individual or cumulative occupational radiation exposures.

The changes of definitions, terminology, paragraph references, and report submittal frequency are necessary to keep IP3 TS consistent with revised federal regulations (i.e. 10 CFR 20 and 10 CFR 50.36(a)). Record retention and reporting requirements will continue to meet NRC regulations. These changes are administrative in nature and do not affect plant hardware or operation.

The changes do not impact the operation, design, configuration, or testing of plant structures, systems or components. As such, the proposed changes do not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. **Does the proposed license amendment create the possibility of a new or different kind of accident from any previously evaluated?**

A. The changes do not impact the operation, design, configuration, or testing of plant

structures, systems or components. The changes do not result in a change in type or amount of radiological effluents released. As such, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

A. The changes are being made in accordance with NRC guidance and continue to assure compliance with the applicable regulatory requirements including 10 CFR 20. The changes do not result in a change in the types or amounts of effluents released. The current level of radiological effluent control will be maintained. As such, the proposed changes do not involve a significant reduction in a margin of safety.

Section IV - Impact of Changes

These changes will not adversely impact the following:

1. ALARA Program
2. Security and Fire Protection programs
3. Emergency Plan
4. FSAR and SER Conclusions
5. Overall Plant Operations and the Environment

Section V - Conclusions

The incorporation of these changes: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the bases for any technical specification; and d) involves no significant hazards considerations as defined in 10 CFR 50.92; e) will not reduce the intent of any Quality Assurance Program commitments.

Section VI - References

1. Indian Point 3 Safety Evaluation Report (SER).
2. Indian Point 3 Safety Analysis Report (FSAR).
3. NRC Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program," January 31, 1989.
4. Title 10, Code of Federal Regulations, Part 20, and 10 CFR 50.36(a), 'Technical Specifications on Effluents from Nuclear Power Reactors'.
5. U. S. Nuclear Regulatory Commission NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors," Generic Letter 89-01, Supplement No. 1, April 1991.
6. NYPA letter dated December 21, 1993 (IPN-93-163), "Implementation of Revised 10 CFR Part 20 Requirements."

7. NRC Questions and Answers on New Part 20 - Sets 1, 2, 3, and 4.
8. Letter from F. J. Congel to J. F. Schmitt (NUMARC).
9. NUREG-0133, Section 4.8 pages 17-18; 3C.
10. NRC Letter to Docket No. 50-416, License No. NPF-29, for Proposed Amendment to the Operation License for the Revised 10 CFR 20 and 10 CFR 50.36a.

ATTACHMENT III TO IPN-99-079

TABLE OF

PROPOSED CHANGES TO ENVIRONMENTAL TECHNICAL SPECIFICATIONS, ODCM, AND PCP INCORPORATING RECOMMENDATIONS OF GENERIC LETTER 89-01 AND THE REVISED 10 CFR PART 20 AND 10 CFR PART 50.36a

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)

Table 1: Changes to the ODCM/Radiological Environmental Controls

1.001	Not Applicable	REC 1.1, Definition ACTION: "That part of a Control that prescribes remedial measures required under designated conditions."	Each Control in the REC has an associated ACTION or ACTIONS. Therefore, the term is being defined and is consistent with NUREG-1301.
1.002	Not Applicable	REC 1.2, 1.3, and 1.4, Definitions CHANNEL CALIBRATION, CHANNEL CHECK, and CHANNEL FUNCTIONAL TEST, respectively.	These terms are used in the REC and the definitions were copied from those currently existing in Appendix A.
1.003	Not Applicable	REC 1.5, Definition EFFLUENT CONCENTRATION	Definition of a new term being added to both Appendix A and the ODCM REC as a result of the provisions of 10 CFR 20
1.004	RETS 1.1, Definition GASEOUS RADWASTE TREATMENT SYSTEM	REC 1.6, Definition GASEOUS RADWASTE TREATMENT SYSTEM	This definition is being relocated from Appendix B to ODCM REC. No wording changes are proposed.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.005	Not Applicable	REC 1.7, Definition LIQUID RADWASTE TREATMENT SYSTEM: "A LIQUID RADWASTE TREATMENT SYSTEM is any system designed and installed to reduce radioactive liquid effluents by collecting liquid radwaste and providing for processing capability and/or holdup for the purpose of reducing and monitoring the total radioactivity prior to release to the environment."	This definition is being added for a term used in the REC but not previously defined in the RETS. The definition is similar to the definition of Gaseous Radwaste Treatment System (RETS 1.1).
1.006	RETS 1.3, Definition MEMBER(S) OF THE PUBLIC: "MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of either utility, their contractors or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational or other purposes not associated with the plant."	REC 1.9, Definition MEMBER(S) OF THE PUBLIC: "MEMBER(S) OF THE PUBLIC means any individual except when that individual receives an occupational dose."	This definition is being updated and relocated from Appendix B to both Appendix A and the ODCM REC. The changes are consistent with 10 CFR 20.1003. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.007	Not Applicable	REC 1.10, Definition OCCUPATIONAL DOSE Occupational dose means the dose received by an individual in the course of employment in which the individual's assigned duties involve exposure to radiation or to radioactive material from licensed and unlicensed sources of radiation, whether in the possession of the licensee or other person. Occupational dose does not include dose received from background radiation, from any medical administration the individual has received, from exposure administered to individuals administered radioactive material and released in accordance with 35.75, from voluntary participation in medical research programs, or as a member of the public.	This definition is being added to define a term used in the current Part 20 definition for Member of the public. This definition is consistent with 10 CFR Part 20.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.008	RETS 1.4, Definition OFFSITE DOSE CALCULATION MANUAL: "... doses due to radioactive .... environmental radiological monitoring program."	REC 1.11, Definition OFFSITE DOSE CALCULATION MANUAL: "... doses resulting from radioactive ... Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Appendix A Technical Specification 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Appendix B Technical Specifications 4.3.2.1 and 4.3.2.2."	This definition is being updated and relocated from Appendix B to both Appendix A and the ODCM REC. The changes are consistent with GL 89-01. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.
1.009	Not Applicable	REC 1.12, Definition OPERABLE - OPERABILITY	This term is used in the REC and the definition was copied from the currently existing Appendix A definition OPERABLE. No wording changes are proposed.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.010	RETS 1.5, Definition PROCESS CONTROL PROGRAM: "... formula ... 10 CFR Part 20, 10 CFR Part 71 and ... of the radioactive waste."	REC 1.13, Definition PROCESS CONTROL PROGRAM: "... formulas ... 10 CFR Parts 20, 61 and 71, and ... of solid radioactive waste."	This definition is being updated and relocated from Appendix B to both Appendix A and the ODCM REC. The changes are consistent with GL 89-01. Reference to Part 61 is added. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.
1.011	RETS 1.6, Definition PURGE - PURGING	REC 1.14, Definition PURGE - PURGING	This definition is being relocated from Appendix B to the ODCM REC. No wording changes are proposed.
1.012	Not Applicable	REC 1.15, Definition RATED THERMAL POWER	This definition is being added for a term used in the REC but not previously defined in the RETS. The definition was copied from the currently existing Appendix A definition RATED THERMAL POWER. No wording changes are proposed.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.013	RETS 1.7, Definition SITE BOUNDARY: "... (see Figure 5.8-1) shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by either site licensee."	REC 1.24, Definition SITE BOUNDARY: "... (see Figure 1-1) means that line beyond which the land or property is not owned, leased or otherwise controlled by either site licensee."	Editorial changes adding "or property" and referencing new figure number. Definition is consistent with 10 CFR 20.1003. Definition being relocated from Appendix B to both Appendix A and the ODCM REC. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.
1.014	RETS 1.9, Definition SOURCE CHECK	REC 1.17, Definition SOURCE CHECK	This definition is being relocated from Appendix B to the ODCM REC. No wording changes are proposed.
1.015	Appendix A, 1.1.2 THERMAL POWER	REC 1.18, Definition THERMAL POWER	This definition is being added for a term currently used in the existing RETS. The definition is being added to the ODCM REC.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.016	RETS 1.10, Definition UNRESTRICTED AREA: "... (see Figure 5.8-1) ... purposes. The UNRESTRICTED AREA boundary may coincide with the exclusion (fenced) area boundary, as defined in 10 CFR 100.3(a), but the UNRESTRICTED AREA does not include areas over water bodies. The concept of UNRESTRICTED AREAS, established at or beyond the SITE BOUNDARY, is utilized in the LIMITING CONDITIONS FOR OPERATION to keep levels of radioactive materials in liquid and gaseous effluents as low as is reasonably achievable, pursuant to 10 CFR 50.36a.	REC 1.25, Definition UNRESTRICTED AREA: "... (see Figure 1-1) means an area, access to which is neither limited nor controlled by either site licensee, but ... is utilized in the radioactive effluent controls..."	This definition is being updated and relocated from Appendix B to both Appendix A and the ODCM REC. The changes are consistent with 10 CFR Part 20. * *While maintaining the current Technical Specification that the UNRESTRICTED AREA does not include areas over water bodies. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.
1.017	RETS 1.11, Definition VENTILATION EXHAUST TREATMENT SYSTEM	REC 1.20, Definition VENTILATION EXHAUST TREATMENT SYSTEM	This definition is being relocated from Appendix B to the ODCM REC. No wording changes are proposed.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.018	RETS 2.1, Specification A: "The radioactive ... Specification 2.3.1 ..."	REC 2.1, Control: "In accordance with Appendix A Technical Specification 6.8.4.a.1, the radioactive ... Control 2.3.1 ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301. Editorial change to update reference to "specification."
1.019	RETS 2.1, Applicability: "Applies to the operating status of the radioactive liquid effluent monitoring instrumentation as shown in Table 2.1-1."	REC 2.1, Applicability: "As shown in Table 2.1-1."	Editorial change eliminating unnecessary wording.
1.020	RETS 2.1, Specification B: "... above specification, without delay ..."	REC 2.1, Action A: "... above Control, immediately ..."	Editorial change to update reference to "specification." Editorial change consistent with NUREG-1301.
1.021	RETS 2.1, Specification C: "... in the next Semiannual Radioactive Effluent Release Report why ... in a timely manner."	REC 2.1, Action B: "... in the next Annual Radioactive Effluent Release Report, pursuant to Reporting Requirement 5.1, why ... within this time frame."	The frequency of the Radioactive Effluent Release Report is being changed from semiannually to annually in accordance with 10 CFR 50.36a. Reporting requirement details will be contained in Section 5.0 of the ODCM REC. Editorial change to clarify "timely manner."
1.022	Not Applicable	REC 2.1, Action C: "Report all deviations in the Annual Radioactive Effluent Release Report."	Additional action statement consistent with NUREG-1301.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.023	RETS Table 2.1-1, Items 1a, 1b, and 2a: "1a ... Line**" "1b ... Line" "2a ... Line"	REC Table 2.1-1, Items 1a, 1b, and 2a: "1a ... Line** (R-18 and R-61)" "1b ... Line (R-19)" "2a ... Line (R-16A, R-16B, R-23)"	Editorial change to identify referenced radiation monitors by number.
1.024	RETS Table 2.1-1, Items 4 and 5: "4 ... RECORDERS*" "5 ... DEVICES**"	REC Table 2.1-1, Items 4 and 5: "4 ... RECORDERS***" "5 ... DEVICES****"	Editorial change to avoid current duplication of table notations.
1.025	RETS Table 2.1-1, Table Notation **: "... specification ..."	REC Table 2.1-1, Table Notation ****: "... Control ..."	Editorial change to update reference to "specification."
1.026	RETS Table 2.1-1, Table Notation, Action 1a: "... Specification 3.3.1A ..."	REC Table 2.1-1, Table Notation, Action 1a: "... Radiological Effluent Control Surveillance Requirement ..."	Editorial change to update reference to "specification."
1.027	RETS Table 3.1-1, Table Notation ***: "... specification ..."	REC Table 3.1-1, Table Notation ***: "... Control ..."	Editorial change to update reference to "specification."
1.028	RETS Table 3.1-1, Table Notation (3): "... channel calibrations ... National Bureau of Standards ... with NBS traceable ... with NBS are acceptable."	REC Table 3.1-1, Table Notation (3): "... CHANNEL CALIBRATIONS ... National Institute of Standards and Technology (NIST) ... with NIST traceable ... with NIST are acceptable."	Editorial change to capitalize defined term. Editorial change to update reference to standard.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.029	RETS 2.2, Specification: "The radioactive ... Specification 2.4.1 ..."	REC 2.2, Control: "In accordance with Appendix A Technical Specification 6.8.4.a.1, the radioactive ... Control 2.4.1 ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301. Editorial change to update reference to "specification."
1.030	RETS 2.2, Applicability: "Applies to the operating status of the radioactive gaseous effluent monitoring instrumentation as shown in Table 2.2-1."	REC 2.2, Applicability: "As shown in Table 2.2-1."	Editorial change eliminating unnecessary wording.
1.031	RETS 2.2, Specification A: "... Specification, without delay ..."	REC 2.2, Action A: "... Control, immediately ..."	Editorial change updating reference to "specification" and editorial change consistent with NUREG-1301.
1.032	RETS 2.2, Specification B: "... Semiannual Radioactive Effluent Release Report why ..."	REC 2.2, Action B: "... Annual Radioactive Effluent Release Report, pursuant to Reporting Requirement 5.1, why ..."	The frequency of the Radioactive Effluent Release Report is being changed from semiannually to annually in accordance with 10 CFR 50.36a. Also, reference is made to the new ODCM REC section that will contain the reporting requirement details.
1.033	Not Applicable	REC 2.2, Action C: "Report all deviations in the Annual Radioactive Effluent Release Report."	Additional action statement consistent with NUREG-1301.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.034	RETS Table 2.2-1, Items 1a, 3a, 4a, 5a: 1a. "... Alarm" 3a. "... Monitor" 4a. "... Monitor" 5a. "... Monitor ..."	REC Table 2.2-1, Items 1a, 2a, 3a, 4a: 1a. "... Alarm (R-20)" 2a. "... Monitor (R-15)" 3a. "... Monitor (R-14, R-27, R-46 and R-59)" 4a. "... Monitor (R-12) ..."	Editorial changes to identify referenced radiation monitors by number. Also, the table item numbers are being changed to reflect the relocation of most of the table to the ODCM REC with the exception of RETS Table 2.2-1 Items 2a & 2b.
1.035	RETS Table 2.2-1, Table Notation *: "... operable ..."	REC Table 2.2-1, Table Notation *: "... OPERABLE ..."	Editorial change to capitalize defined term.
1.036	RETS Table 2.2-1, Table Notation, Action 6: "... with 2.4.6."	REC Table 2.2-1, Table Notation, Action 6: "... with Appendix B Technical Specification 1.3.2."	Editorial change to update referenced Technical Specification section.
1.037	RETS Table 2.2-1, Table Notation, Actions 11 and 12	REC Table 2.2-1, Table Notation, Actions 10 and 11	Editorial change reflecting renumbering of action statements due to relocation of current action statement 11 to ODCM.
1.038	RETS Table 3.2-1, Items 1a, 3a, 4a, 5a, Functional Test Column: 1a. "Q(1)***" 3a. "Q(1)***" 4a. "Q(1)***" 5a. "Q(1)***" "*** Will not include operation of automatic control functions."	REC Table 3.2-1, Items 1a, 2a, 3a, 4a, Functional Test Column: 1a. "Q(1)**" 2a. "Q(1)**" 3a. "Q(1)**" 4a. "Q(1)**" "** Will not include operation of automatic control of functions."	Editorial change reflecting "renumbering" of footnotes due to relocation of most of the table to the ODCM with the exception of RETS Table 3.2-1 Items 2a & 2b.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.039	RETS Table 3.2-1, Item 5a: 5a. "... Monitor - Providing ..."	REC Table 3.2-1, Item 4a: 4a. "... Monitor (R-12) Providing ..."	Editorial change to identify referenced radiation monitor by number.
1.040	RETS Table 3.2-1, Table Notation (2): "... channel calibrations ... National Bureau of Standards or ... with NBS traceable ... with NBS are ..."	REC Table 3.2-1, Table Notation (2): "... CHANNEL CALIBRATIONS ... National Institute of Standards and Technology (NIST) or ... with NIST traceable ... with NIST are ..."	Editorial change to capitalize defined term. Editorial change to update reference to standard.
1.041	RETS 2.3.1, Specification A: "The concentration ..."	REC 2.3.1, Control: "In accordance with Appendix A Technical Specifications 6.8.4.a.2 and 6.8.4.a.3, the concentration ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301.
1.042	RETS 2.3.1, Specification A: "... shall be limited to the concentrations specified in 10 CFR 20.106(a) for radionuclides other than dissolved or entrained noble gases as calculated under 10 CFR 20.106(a)...."	REC 2.3.1, Control: "... shall be limited to 10 times the effluent concentration values specified in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402 for radionuclides other than dissolved or entrained noble gases...."	Changes consistent with 10 CFR Part 20, the Authority's position regarding level of effluent control as stated in Reference 6, and the justifications discussed in the Safety Evaluation (Attachment II).
1.043	RETS 2.3.1, Applicability: "Applies at all times to the concentration of radioactive material released in liquid effluents."	REC 2.3.1, Applicability: "At all times."	Editorial change eliminating unnecessary wording.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.044	RETS 2.3.1, Specification B: "... these limits, without delay ..."	REC 2.3.1, Action: "... the above limits, immediately ..."	Editorial changes reflecting relocation of limits to another subsection of Control 2.3.1, and editorial change consistent with NUREG-1301.
1.045	RETS 3.3.1, Specification A: "... Table 3.3-1."	REC 3.3.1, Surveillance Requirement A: "... Table 3.3.1-1."	Editorial change to Table number to identify that Table belongs with new REC section 3.3.1.
1.046	RETS 3.3.1, Specification B: "... Specification ..."	REC 3.3.1, Surveillance Requirement B: "... Control ..."	Editorial change to update reference to "specification."
1.047	RETS Table 3.3-1	REC Table 3.3.1-1	Editorial change to Table number to identify that Table belongs with new REC section 3.3.1.
1.048	RETS Table 3.3-1, Table Notation a: "... specifications ..."	REC Table 3.3.1-1, Table Notation a: "... Controls ..."	Editorial change to update reference to "specification."
1.049	RETS Table 3.3-1, Table Notation c: "... specification ... in the Semiannual Radioactive Effluent Release Report pursuant to Specification 5.3.3.1."	REC Table 3.3.1-1, Table Notation c: "... Control ... in the Annual Radioactive Effluent Release Report pursuant to Reporting Requirement 5.1."	Editorial change to update reference to "specification." Additionally, the frequency of the Radioactive Effluent Release Report is being changed from semiannually to annually in accordance with 10 CFR 50.36a. Also, reference is made to the new ODCM REC section which will contain all of the reporting requirement details.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.050	RETS 2.3.2, Specification A: "The dose ..."	REC 2.3.2, Control: "In accordance with Appendix A Technical Specifications 6.8.4.a.4 and 6.8.4.a.5, the dose ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301.
1.051	RETS 2.3.2, Applicability: "Applies at all times to the dose from radioactive material released in liquid effluents."	REC 2.3.2, Applicability: "At all times."	Editorial change eliminating unnecessary wording.
1.052	RETS 2.3.2, Specification B: "... pursuant to Specification 5.3.2 ..."	REC 2.3.2, Action: "... pursuant to Appendix A Technical Specification 6.9.2 ..."	Editorial change to reference proposed revised technical specification section.
1.053	RETS 2.3.3, Specification A: "The liquid ..."	REC 2.3.3, Control: "In accordance with Appendix A Technical Specification 6.8.4.a.6, the liquid ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301.
1.054	RETS 2.3.3, Applicability: "Applies at all times to the operation of the liquid radwaste treatment system."	REC 2.3.3, Applicability: "At all times."	Editorial change eliminating unnecessary wording.
1.055	RETS 2.3.3, Specification B: "... days pursuant to Specification 5.3.2 a ..."	REC 2.3.3, Action: "... days, pursuant to Appendix A Technical Specification 6.9.2, a ..."	Editorial change to reference proposed revised technical specification section and editorial changes involving punctuation.
1.056	RETS 3.3.3: "... in the ODCM."	REC 3.3.3: "... in the ODCM when the liquid radwaste treatment systems are not being fully utilized."	Change consistent with NUREG-1301.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.057	RETS 2.4.1, Specification A: "The dose ..."	REC 2.4.1, Controls: "In accordance with Appendix A Technical Specifications 6.8.4.a.3 and 6.8.4.a.7, the dose ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301.
1.058	RETS 2.4.1, Specifications A.1 and A. 2: "... equal to 500 mrems/yr ... equal to 3000 mrems/yr ... equal to 1500 mrems/yr ..."	REC 2.4.1, Controls 1 and 2: "... equal to a dose rate of 500 mrems/yr ... equal to a dose rate of 3000 mrems/yr ... equal to a dose rate of 1500 mrems/yr ..."	Editorial change to clarify entity being measured.
1.059	RETS 2.4.1, Applicability: "Applies at all times to the dose rate due to radioactive materials released in gaseous effluents."	REC 2.4.1, Applicability: "At all times."	Editorial change eliminating unnecessary wording.
1.060	RETS 2.4.1, Specification B: "... without delay ..."	REC 2.4.1, Action: "... immediately ..."	Editorial change consistent with NUREG-1301.
1.061	RETS 3.4.1, Specification B: "... Table 3.4-1."	REC 3.4.1, Surveillance Requirement B: "... Table 3.4.1-1."	Editorial change to identify that Table belongs with new REC section 3.4.1.
1.062	RETS Table 3.4-1	REC Table 3.4.1-1	Editorial change to Table number to identify that Table belongs with new REC section 3.4.1.
1.063	RETS Table 3.4-1, Table Notation a: "... specifications ..."	REC Table 3.4.1-1, Table Notation a: "... Controls ..."	Editorial change to update reference to "specifications."

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.064	RETS Table 3.4-1, Table Notation b: "... specification ... Semiannual Radioactive Effluent Release Report pursuant to Specification 5.3.3.1."	REC Table 3.4.1-1, Table Notation b: "... Control ... Annual Radioactive Effluent Release Report pursuant to Reporting Requirement 5.1."	Editorial change to update reference to "specification." Additionally, the frequency of the Radioactive Effluent Release Report is being changed from semiannually to annually in accordance with 10 CFR 50.36a. Also, reference is made to the new ODCM REC section which will contain the reporting requirement details.
1.065	RETS Table 3.4-1, Table Notation d: "... in is use."	REC Table 3.4.1-1, Table Notation d: "... is in use."	Editorial change transposing words.
1.066	RETS Table 3.4-1, Table Notation f: "... Specification ..."	REC Table 3.4.1-1, Table Notation f: "... Controls ..."	Editorial change to update reference to "specifications."
1.067	RETS 2.4.2, Specification A: "The air ..."	REC 2.4.2, Controls: "In accordance with Appendix A Technical Specifications 6.8.4.a.5 and 6.8.4.a.8, the air ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301.
1.068	RETS 2.4.2, Applicability: "Applies at all times to air dose due to noble gases released in gaseous effluents."	REC 2.4.2, Applicability: "At all times."	Editorial change eliminating unnecessary wording. Consistent with NUREG-1301.
1.069	RETS 2.4.2, Specification B: "... Specification 5.3.2 ..."	REC 2.4.2, Action: "... Appendix A Technical Specification 6.9.2 ..."	Editorial change to reference renumbered TS section.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.070	RETS 2.4.3, Specification A: "The dose ..."	REC 2.4.3, Controls: "In accordance with Appendix A Technical Specifications 6.8.4.a.5 and 6.8.4.a.9, the dose ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301.
1.071	RETS 2.4.3, Applicability: "Applies at all times to the dose due to iodine-131, tritium and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents."	REC 2.4.3, Applicability: "At all times."	Editorial change eliminating unnecessary wording. Consistent with NUREG-1301.
1.072	RETS 2.4.3, Specification B: "... release of iodine-131, tritium and ... effluents, exceeding ... to Specification 5.3.2 a Special ..."	REC 2.4.3, Action: "... release of iodine-131, tritium, and ... effluents exceeding ... Appendix A Technical Specification 6.9.2, a Special ..."	Editorial changes correcting punctuation and reference to applicable technical specification section.
1.073	RETS 2.4.4, Specification A: "The appropriate ..."	REC 2.4.4, Control: "In accordance with Appendix A Technical Specification 6.8.4.a.6, the appropriate ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301.
1.074	RETS 2.4.4, Specification A: "... to any organ in a 31 day period."	REC 2.4.4, Control: "... to any organ of a MEMBER OF THE PUBLIC in a 31 day period."	Editorial change clarifying whose organ and consistent with NUREG-1301.
1.075	RETS 2.4.4, Applicability: "Applies at all times to the operation of the gaseous radwaste treatment system."	REC 2.4.4, Applicability: "At all times."	Editorial change eliminating unnecessary wording. Consistent with NUREG-1301.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.076	RETS 2.4.4, Specification B: "... Specification 5.3.2 a Special ..."	REC 2.4.4, Action: "... Appendix A Technical Specification 6.9.2, a Special..."	Editorial change to reference applicable technical specification section.
1.077	RETS 3.4.4, Specification: "... ODCM."	REC 3.4.4: "... ODCM when the GASEOUS RADWASTE TREATMENT SYSTEMS are not being fully utilized."	Change consistent with NUREG-1301.
1.078	RETS 2.5, Solid Radioactive Waste, Entire Section RETS 3.5, Solid Radioactive Waste Surveillance Requirements, Entire Section	REC 2.5/3.5, Solid Radioactive Waste, Controls and Surveillance Requirements: "These sections are contained in the PCP."	The solid radioactive waste specifications/controls are being relocated to the PCP. Referral to the PCP is being made in the ODCM REC to facilitate discovery and to maintain the numbering scheme of the REC sections close to, if not exactly the same, as the RETS sections which they are coming from.
1.079	RETS 2.6, Specification A: "Limit ... to radiation ..."	REC 2.6, Control: "In accordance with Appendix A Technical Specification 6.8.4.a.10, limit ... to direct radiation ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301. Change clarifying radiation type consistent with NUREG-1301.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.080	RETS 2.6, Applicability: "Applies at all times to the annual dose or dose commitment from releases of radioactivity and to radiation from uranium fuel cycle sources."	REC 2.6, Applicability: "At all times."	Editorial change eliminating unnecessary wording. Consistent with NUREG-1301.
1.081	RETS 2.6, Specification B: "... Specification 2.3.2.A ... made including ... tanks to ... limits identified in the Objective of Specification 2.6 have been exceeded."	REC 2.6, Action A: "... Control 2.3.2.A ... made, including ... tanks, to ... limits have been exceeded."	Editorial changes updating reference to "specification," inserting commas and deleting reference to deleted section.
1.082	RETS 2.6, Specification C: "... case in lieu ... Specification 5.3.2 ..."	REC 2.6, Action B: "... case, in lieu ... Appendix A Technical Specification 6.9.2 ..."	Editorial change inserting comma and updating reference to Technical Specification section.
1.083	RETS 2.6, Specification C: "... Report as defined in 10 CFR Part 20.405c ..."	REC 2.6, Action B: "... Report, as defined in 10 CFR Part 20.2203(a)(4) ..."	Editorial changes inserting comma and updating reference to 10 CFR 20.
1.084	RETS 2.6, Specification C: "... involved, or the ..."	REC 2.6, Action B: "... involved, and the ..."	Additional requirement consistent with NUREG-1301. This clause has been interpreted as "and" rather than "or" in the past.
1.085	RETS 2.6, Specification C: "... report is considered ..."	REC 2.6, Action B: "... report within 30 days is considered ..."	Additional constraint which clarifies "timely" and is consistent with the time frame allowed for other Special Reports referenced in the ODCM.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.086	RETS 3.6, Specification A: "... Specification 3.3.2 ..."	REC 3.6, Surveillance Requirement A: "... Surveillance Requirements 3.3.2 ..."	Editorial change updating reference to "specifications."
1.087	RETS 3.6, Specification B: "... Specification 2.6."	REC 3.6, Surveillance Requirement B: "... Control 2.6."	Editorial change updating reference to "specification."
1.088	Not Applicable	REC 2.7, Control: "In accordance with Appendix A Technical Specification 6.8.4.b.1, the Radiological Environmental Monitoring Program shall be conducted as specified in Table 2.7-1."	Addition of Control statement consistent with NUREG-1301.
1.089	RETS 2.7, Applicability: "Applies at all times to the performance of the radiological environmental monitoring program."	REC 2.7, Applicability: "At all times."	Editorial change eliminating unnecessary wording. Consistent with NUREG-1301.
1.090	RETS 2.7, Specification A: "... Specification 5.3.3.2 ..."	REC 2.7, Action A: "... Reporting Requirement 5.2 ..."	Editorial change to reference new applicable REC section.
1.091	RETS 2.7, Specification B: "... submit, to ... Specification 5.3.2 ... Specifications 2.3.2 ... Specifications 2.3.2 ..."	REC 2.7, Action B: "... submit to ... Appendix A Technical Specification 6.9.2 ... Controls 2.3.2 ... Controls 2.3.2 ..."	Editorial changes deleting comma, updating reference to Technical Specification section, and updating references to "specifications."

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.092	RETS 2.7, Specification C: "... Specification 5.3.3.1 ... Semiannual Radioactive ..."	REC 2.7, Action C: "... Reporting Requirement 5.1 ... Annual Radioactive ..."	Editorial change to reference new applicable section, and change to frequency of the Radioactive Effluent Release Report in accordance with 10 CFR 50.36a.
1.093	RETS, 3rd page of Table 2.7-1, 2nd Column: "... Locations"	REC, 3rd page of Table 2.7-1, 2nd Column: "... Locations"	Editorial change to add inadvertently missing notation letter "a".
1.094	RETS Table 2.7-1, Item 4a, 2nd Column: "... 3 location ... where dose are ..."	REC Table 2.7-1, Item 4a, 2nd Column: "... 3 locations ... where doses are ..."	Editorial changes making grammatical corrections.
1.095	RETS Table 2.7-1, Item 4a, 3rd Column: "... pasture monthly ..."	REC Table 2.7-1, Item 4a, 3rd Column: "... pasture; monthly ..."	Editorial correction adding semi-colon.
1.096	RETS Table 2.7-1, Item 4b, 2nd Column: "... and or recreationally ..."	REC Table 2.7-1, Item 4b, 2nd Column: "... and/or recreationally ..."	Editorial correction adding "/".
1.097	RETS Table 2.7-1, Table Notation a: "... Specification 5.3.3.2 ... Specification 5.3.3.1 ... Semiannual Radioactive ..."	REC Table 2.7-1, Table Notation a: "... Reporting Requirement 5.2 ... Reporting Requirement 5.1 ... Annual Radioactive ..."	Editorial changes to reference new applicable sections and changing frequency of the Radioactive Effluent Release Report from semiannually to annually in accordance with 10 CFR 50.36a.
1.098	RETS Table 3.7-1, Table Notation a: "... Specification 5.3.2.2."	REC Table 3.7-1, Table Notation a: "... Reporting Requirement 5.2."	Editorial change referencing the new applicable section.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.099	RETS Table 3.7-1, Table Notation c: "... specifications ... Specification 5.3.2.2."	REC Table 3.7-1, Table Notation c: "... Controls ... Reporting Requirement 5.2."	Editorial changes updating reference to "specification" and applicable section.
1.101	RETS 2.8, Specification A: "Conduct ... Specifications ..."	REC 2.8, Control: "In accordance with Appendix A Technical Specification 6.8.4.b.2, conduct ... The Controls ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301, and editorial change to update reference to "specification."
1.102	RETS 2.8, Applicability: "Applies at all times to the land use census, which identifies the nearest milk animal, the nearest residence and the nearest garden."	REC 2.8, Applicability: "At all times."	Editorial change eliminating unnecessary wording. Consistent with NUREG-1301.
1.103	RETS 2.8, Specification B: "... Specification 3.4.3 ... Semiannual Radioactive Effluent Release Report, pursuant to Specification 5.3.3.1."	REC 2.8, Action A: "... Control 3.4.3 ... Annual Radioactive Effluent Release Report, pursuant to Reporting Requirement 5.1."	Editorial changes updating reference to "specification," revising the frequency of the Radioactive Effluent Release Report from semiannually to annually in accordance with 10 CFR 50.36a, and referencing the new applicable section.
1.104	RETS 2.8, Specification C: "... Specification 2.7 ... radiological environmental monitoring program ... Specification 5.3.3.1. Identify ... Semiannual ..."	REC 2.8, Action B: "... Control 2.7 ... Radiological Environmental Monitoring Program ... Reporting Requirement 5.1, identify ... Annual ..."	Editorial changes updating reference to "specification," capitalizing name of program, revising the frequency of the Radioactive Effluent Release Report, and referencing the new applicable section.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.105	RETS 3.8, Specification: "... survey, or by ... shall bs ... Specification 5.3.3.2."	REC 3.8, Surveillance Requirements: "... survey, aerial survey or by ... shall be ... Reporting Requirement 5.2."	Editorial change to add "aerial survey" to match with basis words. This is also consistent with NUREG-1301. Other editorial changes to correct typographical error ("bs") and to reference new applicable section.
1.106	RETS 2.9, Specification A: "Perform ..."	REC 2.9, Control: "In accordance with Appendix A Technical Specification 6.8.4.b.3, perform ..."	Change to reference applicable new Technical Specification section consistent with NUREG-1301.
1.107	RETS 2.9, Applicability: "Applies to the performance of the environmental Interlaboratory Comparison Program."	REC 2.9, Applicability: "At all times."	Editorial change eliminating unnecessary wording. Consistent with NUREG-1301.
1.108	RETS 2.9, Specification B: "... Specification 5.3.3.2."	REC 2.9, Action: "... Reporting Requirement 5.2."	Editorial change referencing the new applicable section.
1.109	RETS 3.9, Specification: "... Specification 5.3.3.2."	REC 3.9, Surveillance Requirements: "... Reporting Requirement 5.2."	Editorial change referencing the new applicable section.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.110	RETS 4.0, Bases for Radioactive Liquid Effluent Monitoring Instrumentation: "... exceeding the limits of 10 CFR Part 20."	REC 4.0, Bases for Radioactive Liquid Effluent Monitoring Instrumentation: "... exceeding 10 times the EFFLUENT CONCENTRATION values specified in Appendix B, Table 2, Column 2 to 10 CFR Parts 20.1001 - 20.2402."	Changes consistent with the 10 CFR Part 20, the Authority's position regarding level of effluent control as stated in Reference 6, and the justifications discussed in the Safety Evaluation (Attachment II).
1.111	RETS 4.0, Bases for Radioactive Gaseous Effluent Monitoring Instrumentation: "... the releases of radioactive materials in gaseous effluents during actual or potential releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents."	REC 4.0, Bases for Radioactive Gaseous Effluent Monitoring Instrumentation: "... the releases of radioactive materials in gaseous effluents during actual or potential releases of radioactive materials in gaseous effluents."	Editorial change to delete duplicate wording.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.112	RETS 4.0, Bases for Radioactive Gaseous Effluent Monitoring Instrumentation: "... exceeding the limits of 10 CFR Part 20. This instrumentation also includes provisions for monitoring (and controlling) the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERABILITY ..."	REC 4.0, Bases for Radioactive Gaseous Effluent Monitoring Instrumentation: "... exceeding the limits of 10 CFR Parts 20. The OPERABILITY ..."	Editorial change to delete non-applicable text. Explosive gas mixture monitoring instrumentation specifications will remain in Appendix B while gaseous effluent monitoring instrumentation requirements will be relocated to the ODCM REC.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.113	RETS 4.0, Bases for Liquid Effluents Concentration: "These specifications are ... materials, released ... than the concentration levels specified in 10 CFR Part 20, Appendix B, Table II, Column 2 ... additional assurance ... (2) the limits of 10 CFR Part 20.106(e) to the population ... controlling radioisotope and its MPC ... water using the methods described in International Commission on Radiological Protection (ICRP) Publication 2. This specification applies to the release of liquid effluents from all reactors at the site."	REC 4.0, Bases for Liquid Effluents Concentration: "This control is ... materials released ... than 10 times the EFFLUENT CONCENTRATION values specified in Appendix B, Table 2, Column 2 to 10 CFR Parts 20.1001 - 20.2402. This control provides operational flexibility for releasing liquid effluents in concentrations to follow the Section II.A and II.C design objectives of Appendix I to 10 CFR Part 50 ... reasonable assurance ... (2) the restrictions authorized by 10 CFR Part 20.1301(e) ... controlling radionuclide and its EFFLUENT CONCENTRATION in air ... water. This control does not affect the requirement to comply with the annual limitations of 10 CFR 20.1301(a). This control applies to the release of radioactive materials in liquid effluents from all units at the site.	Editorial changes include substituting "control" for "specification(s)" and correcting punctuation. Other changes are consistent with the draft Part 20 GL and the Authority's position regarding level of effluent control as stated in Reference 6.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.113 con't		The required detection capabilities for radioactive materials in liquid waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD and other detection limits can be found in Currie, L.A., 'Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements,' NUREG/CR-4007 (September 1984), and in the HASL Procedures Manual, HASL-300 (revised annually)."	
1.114	RETS 4.0, Bases for Dose from Liquid Effluents: "These specifications are ... The Limiting Condition for Operation implements ... This specification applies ..."	REC 4.0, Bases for Dose from Liquid Effluents: "This Control is ... The Control statement implements ... This Control applies ..."	Editorial changes updating references to "specifications."
1.115	RETS 4.0, Bases for Liquid Radwaste Treatment System: "... This specification implements ... This specification applies ..."	REC 4.0, Bases for Liquid Radwaste Treatment System: "... This Control implements ... This Control applies ..."	Editorial changes updating references to "specifications."

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.116	RETS 4.0, Bases for Gaseous Effluents Dose Rate	REC 4.0, Bases for Gaseous Effluents Dose Rate	This bases section was extensively revised to be consistent with the draft Part 20, and the justification discussed in the safeety evaluation (Attachment II).
1.117	RETS 4.0, Bases for Dose from Noble Gases: "These specifications are ... The Limiting Condition for Operation implements ... These specification apply ..."	REC 4.0, Bases for Dose from Noble Gases: "This Control is ... The Control statements implement ... This Control applies ..."	Editorial changes updating references to "specifications."
1.118	RETS 4.0, Bases for Dose From Iodine-131, Tritium, and Radionuclides in Particulate Form: "These specifications are ... The Limiting Conditions for Operation are ... The limiting condition for operation statements ... Section II.A ... rate specifications for ... This specification applies ..."	REC 4.0, Bases for Dose From Iodine-131, Tritium, and Radionuclides in Particulate Form: "This Control is ... The Controls are ... The Action statements ... Section III.A ... rate Controls for ... This Control applies ..."	Editorial changes updating references to "specifications" and correction to section reference of Appendix I. The changes are consistent with NUREG-1301.
1.119	RETS 4.0, Bases for Gaseous Radwaste Treatment System: "... achievable'. This specification implements ... part 50.36a ... These specifications apply ..."	REC 4.0, Bases for Gaseous Radwaste Treatment System: "... achievable.' This Control implements ... Part 50.36a ... This Control applies ..."	Editorial changes moving period within closing quotation mark, updating references to "specifications," and capitalizing "part."

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.120	RETS 4.0, Bases for Total Dose: "This specification ... 10 CFR 20 by 46 FR 18525. The Specification ... from plant generated radioactive effluents and direct radiation ... the Special Report with ... 10 CFR Part 20.405c ... 10 CFR Part 20 ... Specifications 2.3.1 ... fuel cycle."	REC 4.0, Bases for Total Dose: "This Control ... 10 CFR Part 20.1301(d). The Control ... due to releases of radioactivity and to radiation from uranium fuel cycle sources ... submittal of the Special Report within 30 days with ... 10 CFR Part 20.2203(a)(4) ... 10 CFR Parts 20.1001 - 20.2402 ... Controls 2.3.1 ... fuel cycle. Demonstration of compliance with the limits of 40 CFR Part 190 or with the design objectives of Appendix I to 10 CFR Part 50 will be considered to demonstrate compliance with the 0.1 rem limit of 10 CFR Part 20.1301."	Editorial changes updating references to "specifications" and applicable sections of 10 CFR Part 20. Added time frame in which to submit special report. The 30 days is consistent with the time to submit various other special reports required and specified in other sections of the proposed ODCM. Other wording changes and additional paragraph are consistent with 10 CFR Part 20.
1.121	RETS 4.0, Bases for Radiological Environmental Monitoring Program: "The radiological environmental monitoring program ... these specifications provide ... or Appendix I ... radiological effluent monitoring program ..."	REC 4.0, Bases for Radiological Environmental Monitoring Program: "The Radiological Environmental Monitoring Program ... this Control provides ... of Appendix I ... Radiological Effluent Monitoring Program ..."	Editorial changes to capitalize program names, update reference to "specifications," and correct typographical error.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.122	RETS 4.0, Bases for Land Use Census: "These specification are ... radiological environmental monitoring program ..."	REC 4.0, Bases for Land Use Census: "This Control is ... Radiological Environmental Monitoring Program ..."	Editorial changes to capitalize program name and update reference to "specifications."
1.123	RETS 5.3.2.1, Semiannual Radioactive Effluent Release Report*: "Routine Radioactive ... Reports ... previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.... * A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit...."	REC 5.1, Annual Radioactive Effluent Release Report: "A Radioactive ... Report ... previous year shall be submitted prior to May 1 of each year. A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit...."	Editorial change relocating text from * footnote at the bottom of page to the end of the first paragraph. Change to the frequency and due date of the Radioactive Effluent Release Report in accordance with 10 CFR 50.36a. The frequency of the report is also reflected in the new section title.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.124	RETS 5.3.2.1, Semiannual Radioactive Effluent Release Report: "... The Radioactive Effluent Release Reports shall include a summary of ... 1.21, 'Measuring Evaluating ... Plant,' ... thereof or as modified in the RETS.... The Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period ... This information will be presented in tabular form similar to that or Table 3 of Reg. Guide 1.21...."	REC 5.1, Annual Radioactive Effluent Release Report: "... The Annual Radioactive Effluent Release Report shall include the following information: • A summary of ... 1.21, 'Measuring, Evaluating ... Plants,' ... thereof or as modified in the REC. • For solid wastes, the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period will be presented in tabular form similar to that of Table 3 of Reg. Guide 1.21 ..."	Editorial changes including correcting title of Regulatory Guide 1.21, reformatting narrative text to use bulleted paragraphs, referencing REC rather than RETS, and some rewording but with no change in context.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.125	RETS 5.3.2.1, Semiannual Radioactive Effluent Release Report: "... The Radioactive Effluent Release Report to be submitted within 60 days after January 1 of each year shall include an annual summary ... stability.** ... ** In lieu of submission with the first half year Radioactive Effluent Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC."	REC 5.1, Annual Radioactive Effluent Release Report: "... • An annual summary ... stability. In lieu of submission with the Radioactive Effluent Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request."	Editorial changes reformatting narrative text to use bulleted paragraphs, and rewording but with no change in context.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.126	RETS 5.3.2.1, Semiannual Radioactive Effluent Release Report: "... This same report shall include an assessment of the radiation doses ... calendar year. This same report shall also include an assessment of the radiation doses ... in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses. (For ORs: approximate and conservative approximate methods are acceptable.) The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM)...."	REC 5.1, Annual Radioactive Effluent Release Report: "... • An assessment of the radiation doses ... calendar year. • An assessment of the radiation doses ... in the report. Approximate and conservative approximate methods for determining the meteorological conditions shall be used for determining gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM)...."	Editorial format changes and clarification of current requirements. The current Technical Specifications allow the use of "approximate and conservative approximate methods" (i.e., the use of annual average meteorological data rather than real time data).

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.127	RETS 5.3.2.1, Semiannual Radioactive Effluent Release Report: "... The Radioactive Effluent Release Report to be submitted 60 days after January 1 of each year shall also include an assessment ... 3.6 including ... Part 190, Environmental ... Operation...."	REC 5.1, Annual Radioactive Effluent Release Report: "... • An assessment ... 3.6, including ... Part 190, 'Environmental ... Operation.' ..."	Editorial format and punctuation changes.
1.128	RETS 5.3.2.1, Semiannual Radioactive Effluent Release Report: "... The Radioactive Effluent Release Reports shall include a list and description ... reporting period...."	REC 5.1, Annual Radioactive Effluent Release Report: "... • A list and description ... reporting period...."	Editorial format change.
1.129	Not Applicable	REC 5.1, Annual Radioactive Effluent Release Report: "... • Pursuant to Controls 2.1 and 2.2 ... time specified. • Pursuant to Controls 2.1 and 2.2 ... Controls. • Pursuant to Control 2.7 ... new locations. • Pursuant to Table 3.3.1-1 ... 3.4.1-1.	Additional reporting requirements incorporated in this overall section from other ODCM sections.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.130	RETS 5.3.2.1, Semiannual Radioactive Effluent Release Report: "... The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM) as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 2.8."	REC 5.1, Annual Radioactive Effluent Release Report: "... • Pursuant to Control 2.8, a listing of new location(s) for dose calculations and/or environmental monitoring identified by the land use census. Include revised figure(s) and table for the ODCM reflecting the new location(s).... • Pursuant to Appendix B Technical Specifications 4.5.2 and 4.6.2, any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM), respectively."	Editorial format changes and rewording.
1.131	Not Applicable	REC 5.1, Annual Radioactive Effluent Release Report: "... • Pursuant to Appendix B Technical Specifications 1.2.1 and 1.3.2 ... Control limits. • Pursuant to Appendix B Technical Specification 4.3.3 ... treatment systems...."	Additional reporting requirements incorporated in this overall section from other ODCM sections.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.132	5.3.2.2, Annual Radiological Environmental Operating Report*: "Routine Radiological ... Reports covering ... * A single submittal may be made for a multiple unit station...."	REC 5.2, Annual Radiological Environmental Operating Report: "An annual Radiological .... Report covering ... A single submittal may be made for a multiple unit station...."	Editorial changes. Relocated text in footnote * to the end of the first paragraph.
1.133	5.3.2.2, Annual Radiological Environmental Operating Report: "... The Annual Radiological ... Reports shall include summaries ... results of the radiological environmental surveillance activities ..."	REC 5.2, Annual Radiological Environmental Operating Report: "... The Annual Radiological ... Report shall include: • Summaries ... results of the Radiological Environmental Monitoring Program ..."	Editorial format changes. Change to reference "Radiological Environmental Monitoring Program" consistent with GL 89-01.
1.134	5.3.2.2, Annual Radiological Environmental Operating Report: "... The reports shall also include the results of land use censuses required by Specification 2.8...."	REC 5.2, Annual Radiological Environmental Operating Report: "... • Pursuant to Control 3.8, the results of the land use census...."	Editorial format and reference changes.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.135	5.3.2.2, Annual Radiological Environmental Operating Report: "... The Annual Radiological Environmental Operating Report shall include the results ... specified in the Table and Figures in the ODCM ... "	REC 5.2, Annual Radiological Environmental Operating Report: "... • The results ... specified in the table and figures in the ODCM ... "	Editorial changes in format and capitalization of text.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.136	5.3.2.2, Annual Radiological Environmental Operating Report: "... The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 2.9; discussion of all deviations from the sampling schedule of Table 2.7-1; and discussion of all analyses in which the LLD required by Table 3.7-1 was not achievable. ** One map shall cover stations near the site boundary; a second shall include the more distant stations."	REC 5.2, Annual Radiological Environmental Operating Report: "... • A summary description of the Radiological Environmental Monitoring Program. • At least two legible maps covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor. One map shall cover stations near the site boundary and the second shall include the more distant stations.... • Pursuant to Table 2.7-1, Notation (a), a discussion of all deviations from the sampling schedule of Table 2.7-1. • Pursuant to Table 3.7-1, Notation (c), a discussion of all analyses and a discussion of the contributing factors for cases in which the LLD required by Table 3.7-1 was not achievable.... • Pursuant to Control 3.9, the results of licensee participation in the Interlaboratory Comparison Program."	Editorial changes including bullet format and capitalization of program name. An additional requirement is being included in this list which was already required by Table 3.7-1.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.137	Not Applicable	REC 5.2, Annual Radiological Environmental Operating Report: "... • A discussion of the reasons for not conducting the Radiological Environmental Monitoring Program as specified by Control 2.7 and the plans for preventing recurrence. • Pursuant to Control 2.7, a discussion of environmental sample measurements that exceed the reporting levels of Table 2.7-2 but are not the result of plant effluents.... • Pursuant to Table 3.7-1, Notation (a), a discussion of identifiable nuclide peaks, including those of nuclides specified in Table 3.7-1.... • Pursuant to Control 2:9, the corrective actions taken to prevent a recurrence if the Interlaboratory Comparison Program is not being performed as required...."	Additional reporting requirements incorporated in this overall section from other ODCM sections.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.138	Not Applicable	REC 5.3, Special Reports: "In lieu of a Licensee Event Report (LER), the following special reports must be generated within 30 days:..."	A new section is being added to list special reporting requirements. These reports are required by various sections of the ODCM.
1.139	ODCM according to Specifications 2.1 and 2.2.	ODCM 1.2 ...according to Radiological Effluent Controls 2.1 and 2.2	Editorial change to update reference.
1.140	ODCM 1.2.1 ...** These limits are not part of Technical Specification 2.4.1, but are included for information, as these limits are used for operational control of releases. *** From Technical Specification, 2.4.1	ODCM 1.2.1 ...** These limits are not part of Radiological Effluent Control 2.4.1, but are included for information, as these limits are used for operational control of releases. *** From Radiological Effluent Control 2.4.1	Editorial change to update reference.
1.141	ODCM 1.2.2.1 ...to the levels listed in 10 CFR 20 Appendix B, Table II, Column 2.	ODCM 1.2.2.1 ...to the levels listed in 10 CFR 20 Appendix B, Table 2, Column 2.	Editorial change to update reference to current 10 CFR 20.
1.142	ODCM 2.1.1... in Section 3.3.1 of the Technical Specifications	ODCM 2.1.1 ...in Section 3.3.1 of the Radiological Effluent Controls (RECS)...	Editorial change to update reference.
1.143	ODCM 2.1.7 ...exceed Section 2.3 requirement of the RETS...	ODCM 2.1.7 ...exceed Section 2.3 requirement of the RECS...	Editorial change to update reference.
1.144	ODCM 2.1.9 ...at the frequencies specified in Table 3.3-1B of the RETS.	ODCM 2.1.9 ...at the frequencies specified in Table 3.3.1-1 of the RECS.	Editorial change to update reference.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.145	ODCM 2.1.11 ...excluding tritium and noble gas, as per section 2.3.4 of the Technical Specifications.	ODCM 2.1.11 ...excluding tritium and noble gas, as per section 1.2.1, Appendix B of the Technical Specifications.	Editorial change to update reference.
1.146	ODCM 2.1.13 ...The service water radioactivity monitor listed in Table 2.1-1 of the RETS is... ...the removal of that monitor from service is not specifically addressed in the Radiological Environmental Technical Specification,	ODCM 2.1.13 ...The service water radioactivity monitor listed in Table 2.1-1 of the RECS is... ...the removal of that monitor from service is not specifically addressed in the Radiological Environmental Controls,	Editorial changes to update references.
1.147	ODCM 2.1.14 - Liquid effluent concentrations are limited to 10 CFR 20 limits, as calculated under 10 CFR 20.106a, which permits averaging of effluent concentration over one year. This method is appropriate for batch liquid waste tanks since doses from this liquid pathway are the result of total curies released and are not greatly influenced by instantaneous concentrations.	ODCM 2.1.14 - Liquid effluent concentrations must be within the limitations of 2.3.1 of the RECS.	Change to update reference to limitations defined in RECS (i.e., ODCM, Part 1, Radiological Effluent Controls).

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.148	ODCM 2.1.18 ...releases from this system will be in accordance with the requirements for batch waste release tanks listed in the RETS.	ODCM 2.1.18 ...releases from this system will be in accordance with the requirements for batch waste release tanks listed in the RECS.	Editorial change to update reference.
1.149	ODCM 2.2.1 - This section provides a description of the means that will be used to demonstrate compliance with Technical Specification 2.3.1.	ODCM 2.2.1 -This section provides a description of the means that will be used to demonstrate compliance with Radiological Effluent Control 2.3.1.	Editorial change to update reference.
1.150	ODCM 2.2.6 - This section describes the methodology used to ensure the requirements of section 2.3.1 of the RETS are satisfied. The total discharge canal concentration of radionuclides must be maintained less than the effective maximum permissible concentration for the radionuclide mixture, when averaged per 10 CFR 20.106a. The noble gases will be included using the limit 2E-4 uCi/ml as specified in section 2.3.1 of the RETS.	ODCM 2.2.6 - This section describes the methodology used to ensure the requirements of section 2.3.1 of the RECS are satisfied. The total discharge canal concentration of radionuclides must be maintained less than those identified by section 2.3.1 of the RECS. The noble gases will be included using the limit 2E-4 uCi/ml as specified in section 2.3.1 of the RECS.	Editorial change to update reference. Change to update reference to current Part 20. Consistent with current Part 20.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.151	ODCM 2.3.1 - Section 2.3.2 of the Technical Specification.... ....existing perimeter and environmental TLDs per Tech. Spec. 2.6.B.	ODCM 2.3.1 - Section 2.3.2 of the Radiological Effluent Controls.... ....existing perimeter and environmental TLDs per RECS 2.6.A.	Editorial change to update reference.
1.152	ODCM 2.3.2 - Section 2.3.3 of the Technical Specifications requires...	ODCM 2.3.2 - Section 2.3.3 of the Radiological Effluent Controls requires	Editorial change to update reference.
1.153	ODCM 2.3.3 - Section 2.3.1 of Technical Specifications require that the concentration of radioactive material released from the site shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases (when averaged per 10 CFR 20.106a).	ODCM 2.3.3 - Section 2.3.1 of Radiological Effluent Controls require that the concentration of radioactive material released from the site shall be limited to 10 times the concentration values specified in 10 CFR Part 20, Appendix B, Table 2 Column 2 for radionuclides other than dissolved or entrained noble gases.	Editorial changes to update references. Consistent with CFR Part 20 and the justifications in the Safety Evaluation (Attachment II).
1.154	ODCM 2.4.2 - (page 2-10) ...as contained in the Technical Specifications. ...in Technical Specifications from all liquid radioactive waste management systems.	ODCM 2.4.2 - (page 2-10) ...as contained in the Radiological Effluent Controls. ...in the Radiological Effluent Controls from all liquid radioactive waste management systems.	Editorial changes to update references.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.155	ODCM 3.1.1 ...are contained in the Technical Specifications.	ODCM 3.1.1 ...are contained in the Radiological Effluent Controls.	Editorial changes to update references.
1.156	ODCM 3.1.4 ...and the monthly grab sample described in Technical Specifications Table 3.4.1-1...	ODCM 3.1.4 ...and the monthly grab sample described in Radiological Effluent Controls Table 3.4.1-1...	Editorial changes to update references.
1.157	ODCM 3.1.8 ...may be used if the Plant Manager...	ODCM 3.1.8 ...may be used if the Site Executive Officer...	Editorial change to update title.
1.158	ODCM 3.1.13 ...The process flow rate monitor surveillance requirements specified in RETS Table 3.2-1	ODCM 3.1.13 ...The process flow rate monitor surveillance requirements specified in RECS Table 3.2-1	Editorial changes to update references.
1.159	ODCM 4.0 - The locations listed in Table 4.1 are the RETS designated locations only.	ODCM 4.0 - The locations listed in Table 4.1 are the RECS designated locations only.	Editorial changes to update references.
1.160	ODCM Table 4.1, Note 1 - ...as long as the required RETS LLD is met	ODCM Table 4.1, Note 1 - ...as long as the required RECS LLD is met	Editorial changes to update references.
1.161	ODCM, Appendix B, Note ...in accordance with Technical Specifications.	ODCM, Appendix B, Note ...in accordance with Radiological Effluent Controls.	Editorial changes to update references.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
1.162	Not Applicable	REC 1.8, Definition MAXIMUM PERMISSIBLE CONCENTRATION WATER (MPCW) MPCW is that concentration of a radionuclide equal to 10 times the concentration of a radionuclide specified in 10 CFR 20, Appendix B, Table 2, Column 2.	Changes consistent with 10 CFR Part 20, the Authority's position regarding level of effluent control as stated in Reference 6, and the justifications discussed in the Safety Evaluation (Attachment II).

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)

Table 2: Changes to PCP

2.001	RETS 1.8, Definition SOLIDIFICATION	PCP 5.1.20, Add the definition of SOLIDIFICATION: "Solidification shall be the conversion of wet wastes into a form that meets shipping and burial ground requirements."	This definition is being relocated from Appendix B to the PCP. No wording changes are proposed.
2.002	RETS 2.5, Solid Radioactive Waste, section 2.5.A "To ensure the safe operation... A. Ensure that the solid..."	PCP 1.0 Purpose, Add: "To ensure the safe operation of the solid radwaste system, the solid radwaste will be used in accordance with this Process Control Program to process wet radioactive wastes to meet shipping and burial ground requirements."	This is being relocated from Appendix B to the PCP. Editorial change to combine objective and specification 2.5.A.
2.003	RETS 2.5, Solid Radioactive Waste	PCP 4.0 g, Add: "Suspend shipments of defectively processed or defectively packaged solid radioactive wastes from the site when the provisions of this process control program are not satisfied."	This is being relocated from Appendix B to the PCP. Additional responsibility to coincide with relocation of Technical Specification 2.5.B to the PCP.
2.004	RETS 2.5, Solid Radioactive Waste, section 2.5.B	PCP 7.2 c, Add: "With the provisions of this process control program not satisfied, suspend shipments of defectively processed or defectively packaged solid radioactive wastes from the site."	This is being relocated from Appendix B to the PCP. No wording changes are proposed.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
2.005	RETS 3.5, Solid Radioactive Waste Surveillance Requirements "The PROCESS CONTROL PROGRAM shall be used to verify the SOLIDIFICATION of at least... (e.g., filter sludges, spent resins, evaporator bottoms, boric acid solutions, and sodium sulfate solutions). A. ... determined in accordance with the PROCESS CONTROL PROGRAM, and a subsequent test verifies SOLIDIFICATION. SOLIDIFICATION parameters determined by the PROCESS CONTROL PROGRAM. B. ... the PROCESS CONTROL PROGRAM shall provide for the collection ... The PROCESS CONTROL PROGRAM shall be modified as required, as provided in Specification 5.3, to assure SOLIDIFICATION of subsequent batches of waste.	PCP 9.1.1 c, Practices, Add to the solidification section: "If solidification is required in the future, then at least one representative test specimen from at least every tenth batch of each type of wet radioactive waste will be checked to verify solidification. If any test specimen fails to verify solidification, the solidification of the batch under test shall be suspended until such time as additional test specimens can be obtained, alternative solidification parameters can be determined, and a subsequent test verifies solidification. If the initial test specimen from a batch of waste fails to verify solidification, then provide for the collection and testing of representative test specimens from each consecutive batch of the same type of wet waste until at least 3 consecutive initial test specimens demonstrates solidification. The process shall be modified as required to assure solidification of subsequent batches of waste.	This change is being relocated from Appendix B with editorial changes to eliminate unnecessary wording.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
2.006	Not Applicable	9.8 Reporting 9.8.1 Releases In accordance with Technical Specification Appendix B 4.3.2.1 and the REC section 5.1, ensure that the Annual Radioactive Effluent Release Report includes a summary of the quantities of solid radioactive waste released from the unit. 9.8.2 Major Changes to the Process Control Program Licensee initiated major changes to the radioactive waste systems shall be reported to the Commission in the Annual Radioactive Effluent Release Report for the year in which the change evaluation was reviewed by the PORC. The discussion of each change shall contain those items noted in the REC section 5.1.	PCP 9.8, Reporting, Add a section on reporting requirements: This will ensure consistency between the reporting requirements in T.S. 4.3.2.1 and REC 5.1.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)

Table 3: Changes to Appendix A

3.001	Not Applicable	Appendix A 1.19, Definition EFFLUENT CONCENTRATION: "The EFFLUENT CONCENTRATION is that concentration of a radionuclide specified in 10 CFR 20, Table 2 of Appendix B to Sections 1001 - 2402."	Definition of a new term being added to both Appendix A and the ODCM REC as a result of the provisions of 10 CFR 20.1001 - 20.2402.
3.002	RETS 1.3, Definition MEMBER(S) OF THE PUBLIC: "MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of either utility, their contractors or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational or other purposes not associated with the plant."	Appendix A 1.20, Definition MEMBER(S) OF THE PUBLIC: "MEMBER(S) OF THE PUBLIC means any individual except when that individual is receiving an occupational dose."	This definition is being updated and relocated from Appendix B to both Appendix A and the ODCM REC. The changes are consistent with 10 CFR 20.1003. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.003	Not Applicable	Appendix A 1.21, Definition OCCUPATIONAL DOSE: OCCUPATIONAL DOSE means the dose received by an individual in the course of employment in which the individual's assigned duties involve exposure to radiation or to radioactive material from licensed and unlicensed sources of radiation, whether in the possession of the licensee or other person. OCCUPATIONAL DOSE does not include dose received from background radiation, from any medical administration the individual has received, from exposure administered to individuals administered radioactive material and released in accordance with 35.75, from voluntary participation in medical research programs, or as a MEMBER OF THE PUBLIC.	Added definition to define term used in definition of MEMBER OF THE PUBLIC. This change is consistent with 10 CFR 20.1003.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.004	RETS 1.4, Definition OFFSITE DOSE CALCULATION MANUAL (ODCM): "... doses due to radioactive ... environmental radiological monitoring program."	Appendix A 1.22, Definition OFFSITE DOSE CALCULATION MANUAL: "... doses resulting from radioactive ... Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Appendix A Technical Specification 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Appendix B Technical Specifications 4.3.2.1 and 4.3.2.2."	This definition is being updated and relocated from Appendix B to both Appendix A and the ODCM REC. The changes are consistent with GL 89-01. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.005	RETS 1.5, Definition PROCESS CONTROL PROGRAM (PCP): "... formula ... 10 CFR Part 20, 10 CFR Part 71 and ... of the radioactive waste."	Appendix A 1.23, Definition PROCESS CONTROL PROGRAM: "... formulas ... 10 CFR Parts 20, 61 and 71, and ... of solid radioactive waste."	This definition is being updated and relocated from Appendix B to both Appendix A and the ODCM REC. The changes are consistent with GL 89-01. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.
3.006	RETS 1.7, Definition SITE BOUNDARY: "... (see Figure 5.8-1) shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by either site licensee."	Appendix A 1.24, Definition SITE BOUNDARY: "... (see Figure 1-1) means that line beyond which the land or property is not owned, leased, or otherwise controlled by either site licensee."	Editorial changes adding "property" and referencing new figure number. Definition is consistent with the draft Part 20 GL and 10 CFR 20.1003. Definition being relocated from Appendix B to both Appendix A and the ODCM REC. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.007	RETS 1.10, Definition UNRESTRICTED AREA: "... (see Figure 5.8-1) ... purposes. The UNRESTRICTED AREA boundary may coincide with the exclusion (fenced) area boundary, as defined in 10 CFR 100.3(a), but the UNRESTRICTED AREA does not include areas over water bodies. The concept of UNRESTRICTED AREAS, established at or beyond the SITE BOUNDARY, is utilized in the LIMITING CONDITIONS FOR OPERATION to keep levels of radioactive materials in liquid and gaseous effluents as low as is reasonably achievable, pursuant to 10 CFR 50.36a.	Appendix A 1.25, Definition UNRESTRICTED AREA: "... (see Figure 1-1) means an area, access to which is neither limited nor controlled by either site licensee, but...is utilized in the radioactive effluent program...".	This definition is being updated and relocated from Appendix B to both Appendix A and the ODCM REC. The changes are consistent with 10 CFR Part 20. * *While maintaining current Technical Specification stipulation that the UNRESTRICTED AREA does not include areas over water bodies. Definitions for terms used in Appendix A and/or Appendix B will be contained in the Appendix A Definition Section.
3.008	Appendix A 6.8, Title: "Procedures"	Appendix A 6.8, Title: "Procedures and Programs"	Editorial change reflecting addition of program requirements to the section.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.009	Not Applicable	Appendix A 6.8.1.k: "k. Radioactive Effluent Control Program implementation."	The addition of REC Program implementation procedures to the list of required procedures is consistent with the addition of the REC Program (proposed Appendix A Technical Specification 6.8.4.a).
3.010	Not Applicable	Appendix A 6.8.1.l: "l. Radiological Environmental Monitoring Program implementation."	The addition of REM Program implementation procedures to the list of required procedures is consistent with the addition of the REM Program (proposed Appendix A Technical Specification 6.8.4.b).
3.011	GL 89-01, Model Technical Specifications 6.8.4.g and h	Appendix A 6.8.4.a and b	The addition of procedural controls for the REC and REM Programs to Appendix A is consistent with the guidance of GL 89-01, with exceptions noted below.
3.012	GL 89-01, Model Technical Specification 6.8.4.g: "... (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements ..."	Appendix A 6.8.4.a: "... and (2) shall be implemented by site procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements ..."	Editorial change. The REC Program will be implemented by site procedures, not just operating procedures.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.013	GL 89-01, Model Technical Specification 6.8.4.g.7 "... to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table II, Column 1,"	Appendix A 6.8.4.a.7: "... from the site to areas at or beyond the SITE BOUNDARY shall be limited to the following: a. For noble gases: Less than or equal to a dose rate of 500 mrems/yr to the total body and less than or equal to a dose rate of 3000 mrems/yr to the skin, and b. For iodine-131, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to dose rate of 1500 mrems/yr to any organ."	Change consistent with the draft Part 20 GL and more detailed than required by GL 89-01.
3.014	GL 89-01 Model Technical Specification 6.8.4.g.9: "... from Iodine-131, Iodine-133, tritium ..."	Appendix A 6.8.4.a.9: "... from iodine-131, tritium ..."	The exclusion of Iodine-133 is consistent with current IP3 RETS.
3.015	GL 89-01 Model Technical Specification 6.8.4.g.10: "Limitations on venting and purging of the Mark II containment through the Standby Gas Treatment System to maintain releases as low as reasonable achievable (BWRs w/Mark II containments), and ..."	Not applicable	This specification is not applicable to IP3, a PWR, and, therefore, is not being included.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.016	Not Applicable	Appendix A 6.8.4.c: "Process Control Program A program shall be provided to ensure that the processing and packaging of solid radioactive wastes shall be accomplished in compliance with 10 CFR Parts 20, 61 and 71, and Federal and State regulations and other requirements governing the disposal of solid radioactive waste. The program requirements shall be contained in the PCP manual."	The addition of this Technical Specification is consistent with the additions of proposed Technical Specifications 6.8.4.a and 6.8.4.b.
3.017	Appendix A 6.9.1.3, Annual Radiation Exposure Reports: "... (including contractors) receiving ... man rem ... 1/ ... 20.407 ..."	Appendix A 6.9.1.3, Annual Radiation Exposure Reports: "... (including contractors), for whom monitoring was required, ... man-rem ... 1/ ... 20.2206 ..."	Changes consistent with the draft Part 20 GL.
3.018	Appendix A 6.9.2.g: "... limits (Appendix B Specifications 2.3, 2.4, 2.5, 2.6)"	Appendix A 6.9.2.g: "... limits (Technical Specification 6.8.4.a) "	Editorial change referencing new applicable Technical Specification section.
3.019	Appendix A 6.9.2.i: "... levels (Appendix B Specification 2.7, 2.8, 2.9)"	Appendix A 6.9.2.i: "... levels (Technical Specification 6.8.4.b)"	Editorial change referencing new applicable Technical Specification section.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.020	Not Applicable	Appendix A 6.9.2.l: "l. Inoperable explosive gas monitoring instrumentation (Appendix B Technical Specification 1.1.1)"	Additional requirement for special report pursuant to proposed Technical Specification Appendix B 1.1.1.
3.021 A	Appendix A 6.10.2.d: "d. Records of radiation exposure for all individuals entering radiation control areas".	Appendix A 6.10.2.d: "d. Records of radiation exposure as required by 10 CFR 20".	Clarify requirement consistent with 10 CFR 20.
3.021 B	GL 89-01 Model Technical Specification 6.10.3.o: "o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM."	Appendix A 6.10.2.p: "p. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM."	Additional requirement consistent with GL 89-01.
3.022	Appendix A 6.11, Radiation and Respiratory Protection Program: "... 20.103, allowance shall be made ... Appendix B, Table I, Column 3 of 10 CFR 20."	Appendix A 6.11, Radiation and Respiratory Protection Program: "... 20.1703, allowance may be made ... Appendix B, Table 1, Column 3 of 10 CFR 20."	Editorial changes updating references to Part 20 sections. Change from "shall" to "may" reflects the actual wording of the regulation, 10 CFR 20.1703(b), which allows the licensee to make an allowance for respiratory protection equipment if stipulations of the regulation are met.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.023	Appendix A 6.12, High Radiation Area, 6.12.1: "... 20.203 of 10 CFR 20 ... is 1000 mrem/hr or less and 100 mrem/hr or greater ... Radiation Work Permit*."	Appendix A 6.12, High Radiation Area: "... 20.1601 of 10 CFR 20, each high radiation area in which the radiation level is greater than 100 mrem/hr ** but less than 1000 mrem/hr** ... Radiation Work Permit (RWP)*."	Editorial changes updating references to Part 20 sections and definitions, rewording sentence to reference lower limit prior to upper limit, and adding abbreviation. Added asterisks for reference to measure dose rates at 30 cm from the source of radioactivity. Consistent with 10 CFR Part 20.

TABLE OF PROPOSED CHANGES

ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
3.024	Appendix A 6.12.2, "The requirements of 6.12.1 above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas ...	Appendix A 6.12.2*, "In addition to the requirements of 6.12.1 above, areas accessible to individuals with radiation levels such that an individual could receive in 1 hour a dose greater than 1000 mrem**, shall be provided with locked doors to prevent unauthorized entry ... * Health Physics Personnel shall be exempt from the RWP issuance requirements for entries into high radiation areas during the performances of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas. ** Measured at 30 centimeters (12 inches) from radiation sources external to the body or 30 centimeters from any surface the radiation penetrates. *** Measured at 1 meter from radiation sources external to the body or 30 centimeters (12 inches) from any surface the radiation penetrates".	Changes consistent with current Technical Specification requirements for high radiation areas. The added footnotes are consistent with 10 CFR Part 20.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)

Table 4: Changes to Appendix B

4.001	RETS 2.2, Radioactive Gaseous Effluent Monitoring Instrumentation, Specification: "The radioactive gaseous effluent ... Table 2.2-1 ... of Specification 2.4.1 ... The alarm/trip set points of these channels shall be determined and adjusted in accordance with the methodology and parameters in the ODCM...."	Appendix B 1/2.1, Monitoring Instrumentation, 1.1.1 Explosive Gas Monitoring Instrumentation, LCO: "The explosive gas ... Table 1.1.1-1 ... of Appendix B Technical Specification 1.3.1...."	Controls for gaseous effluent monitoring instrumentation are being relocated to the ODCM. Specifications for explosive gas monitoring instrumentation will remain in Appendix B. The proposed explosive gas Technical Specifications are consistent with GL 89-01. Editorial changes reflecting new section numbers.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.002	RETS 2.2, Applicability: "Applies to the operating status of the radioactive gaseous effluent monitoring instrumentation as shown in Table 2.2-1."	Appendix B 1.1.1, Applicability: "As shown in Table 1.1.1-1."	Controls for gaseous effluent monitoring instrumentation are being relocated to the ODCM. Specifications for explosive gas monitoring instrumentation will remain in Appendix B. The proposed explosive gas Technical Specifications are consistent with GL 89-01. Editorial changes eliminating unnecessary wording and reflecting new section numbers.
4.003	RETS 2.2, Specification A: "With a radioactive gaseous effluent ... Specification, without delay suspend the release of radioactive gaseous effluents monitored by the affected channel or declare the channel inoperable, or change the set point so it is acceptable conservative."	Appendix B 1.1.1, Action A: "With an explosive gas ... Specification, declare the channel inoperable and take the ACTION shown in Table 1.1.1-1."	Controls for gaseous effluent monitoring instrumentation are being relocated to the ODCM. Specifications for explosive gas monitoring instrumentation will remain in Appendix B. The proposed explosive gas Technical Specifications are consistent with GL 89-01.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.004	RETS 2.2, Specification B: "... radioactive gaseous effluent ... Table 2.2-1..... explain in the next Semiannual Radioactive Effluent Release Report ..."	Appendix B 1.1.1, Action B: "... explosive gas ... Table 1.1.1-1.... prepare and submit to the Commission, pursuant to Appendix B Technical Specification 4.3.1, a Special Report to explain ..."	Controls for gaseous effluent monitoring instrumentation are being relocated to the ODCM. Specifications for explosive gas monitoring instrumentation will remain in Appendix B. The proposed explosive gas Technical Specifications are consistent with GL 89-01.
4.005	RETS 3.2, Specifications: "Radioactive gaseous effluent monitoring ... CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 3.2-1."	Appendix B 2.1.1: "The explosive gas monitoring ... CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 2.1.1-1."	Controls for gaseous effluent monitoring instrumentation are being relocated to the ODCM. Specifications for explosive gas monitoring instrumentation will remain in Appendix B. The proposed explosive gas Technical Specifications are consistent with GL 89-01.
4.006	RETS Table 2.2-1, Items 2a & 2b, Applicability Column: 2a. "**" 2b. "**" "** During waste gas holdup system operation (treatment for primary system off gases.)"	Appendix B Table 1.1.1-1, Items 1a & 1b, Applicability Column: 1a. "*" 1b. "*" "* During waste gas holdup system operation (treatment for primary system off gases.)"	Editorial change "renumbering" table notation.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.007	RETS Table 2.2-1, Radioactive Gaseous Effluent Monitoring Instrumentation, Items 2a & 2b, Action Column: 2a. "10" 2b. None given	Appendix B Table 1.1.1-1, Explosive Gas Monitoring Instrumentation, Items 1a & 1b, Action Column: 1a. "1" 1b. "1"	Editorial change to renumber action statement and addition of same action statement for Item 1b. This represents an additional requirement.
4.008	RETS Table 3.2.-1, Radioactive Gaseous Effluents Monitoring Instrumentation Surveillance Requirements, Source Check & Functional Test Columns	Appendix B Table 2.1.1-1, Explosive Gas Monitoring Instrumentation Surveillance Requirements	The Source Check and Functional Test Columns of the current Technical Specification Table are not applicable to the new Table, Explosive Gas Monitoring Instrumentation Surveillance Requirements.
4.009	RETS Table 3.2-1, Items 2a & 2b, Channel Calibration Column: 2a. "M(3)" 2b. "M(4)"	Appendix B Table 2.1.1-1, Items 1a & 1b, Channel Calibration Column: 1a. "M(1)" 1b. "M(2)"	Editorial changes renumbering table notations due to relocation of text to ODCM.
4.010	RETS Table 3.2-1, Items 2a & 2b, Modes in Which Surveillance Required Column: 2a. "**" 2b. "**" "** During waste gas holdup system operation (treatment for primary system off gases.)"	Appendix B Table 2.1.1-1, Items 1a and 1b, Modes in Which Surveillance Required Column: 1a. "*" 1b. "*" "* During waste gas holdup system operation (treatment for primary system off gases.)"	Editorial changes "renumbering" table notation.
4.011	RETS Table 3.2-1, Table Notations (3) and (4)	Appendix B Table 2.1.1-1, Table Notations (1) and (2)	Editorial change renumbering table notations.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.012	RETS Table 3.2-1, Table Notations N.A., Q, 18M, 24M	Not Applicable	Editorial change deleting table notations not referenced in new Appendix B.
4.013	RETS 2.3.4, Specification A.a: "Refueling Water Storage Tank" RETS 3.3.4, Objective 1: "Refueling Water Storage Tank** ... ** After refueling operations, liquid from the reactor cavity will be sampled for radioactive material content prior to being pumped into the tank."	Appendix B 1.2.1, LCO: "a. Refueling Water Storage Tank** ... ** After refueling operations, liquid from the reactor cavity will be sampled for radioactive material content prior to being pumped into the tank."	Editorial change incorporating note ** from current RETS section 3.3.4. The note currently appears in the "Objective" paragraph of section 3.3.4 which is to be deleted.
4.014	RETS 2.3.4, Specification A.e: "Outside Temporary Tank" RETS 3.3.4, Objective 5: "Outside Temporary Tank*** ... *** Liquid will be sampled for radioactive content prior to being pumped into the tank."	Appendix B 1.2.1, LCO: "... e. Outside Temporary Tank*** ... *** Liquid will be sampled for radioactive content prior to being pumped into the tank."	Editorial change incorporating note *** from current RETS section 3.3.4. The note currently appears in the "Objective" paragraph of section 3.3.4 which is to be deleted.
4.015	RETS 2.3.4, Liquid Holdup Tanks, Applicability: "Applies at all times to the quantity of radioactive material contained in the liquid holdup tanks."	Appendix B 1.2.1, Radioactive Liquid Effluent Holdup Tanks, Applicability: "At all times."	Editorial change eliminating unnecessary wording.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.016	RETS 2.3.4, Specification B: "... tank, within 48 ... Semiannual Radioactive Effluent Release Report."	Appendix B 1.2.1, Action: "... tank. Within 48 ... Annual Radioactive Effluent Release Report.	Editorial changes: 1) making two sentences out of one for clarity, and 2) changing the frequency of the Radioactive Effluent Release Report from semiannually to annually in accordance with 10 CFR 50.36a.
4.017	RETS 2.4.5, Objective: "To limit the concentration ... holdup system to less ..."	Appendix B 1.3.1, LCO: "The concentration ... holdup system shall be limited to less ..."	Editorial changes to rephrase current wording into Standard Technical Specification LCO format.
4.018	RETS 2.4.5, Applicability: "Applies at all times to the concentration of oxygen in the waste gas holdup system, whenever H_2 concentration exceeds 4% by volume."	Appendix B 1.3.1, Applicability: "At all times."	Editorial change eliminating unnecessary wording.
4.019	RETS 2.4.5, Specification B: "... volume without delay."	Appendix B 1.3.1, Action B: "... volume."	Editorial change deleting redundant wording.
4.020	RETS 3.4.5, Specification: "... Table 2.2-1 of Specification 2.2."	Appendix B 2.3.1: "... Appendix B Technical Specification Table 1.1.1-1."	Editorial change to reference renumbered TS section.
4.021	RETS 2.4.6, Objective: "To limit the quantity ... tank to ... (considered as Xe-133)."	Appendix B 1.3.2, LCO: "The quantity ... tank shall be limited to ... (considered as Xe-133)."	Editorial changes to rephrase current wording into Standard Technical Specification LCO format.
4.022	RETS 2.4.6, Applicability: "Applies at all times to the quantity of radioactivity contained in each gas storage tank."	Appendix B 1.3.2, Applicability: "At all times."	Editorial change eliminating unnecessary wording.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.023	RETS 2.4.6, Specification: "... tank and within 48 ... limit."	Appendix B 1.3.2, Action: "... tank. Within 48 ... limit, and describe the events leading to this condition in the next Annual Radioactive Effluent Release Report."	Addition of reporting requirement consistent with current Appendix B Tech Spec 2.3.4B (proposed Appendix B Tech Spec 1.2.1).
4.024	RETS 4.0, Bases for Radioactive Gaseous Effluent Monitoring Instrumentation: "The radioactive gaseous effluent instrumentation ... control as applicable ... holdup system. The OPERABILITY ... Criteria 60, 63 and 64 of Appendix A ..."	Appendix B 3.0, Bases for Explosive Gas Monitoring Instrumentation: "The explosive gas monitoring ... control the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERABILITY ... Criteria 60 of Appendix A ..."	Controls for gaseous effluent monitoring instrumentation are being relocated to the ODCM. Specifications for explosive gas monitoring instrumentation will remain in Appendix B. The proposed explosive gas Technical Specifications are consistent with GL 89-01.
4.025	RETS 4.0, Bases for Liquid Holdup Tanks: "... these Specifications ... limits of 10 CFR Part 20, Appendix B, Table II, Column 2 ... portable ..."	Appendix B 3.0, Bases for Liquid Holdup Tanks: "... this Specification ... values given in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402 ... potable ..."	Changes consistent with 10 CFR Part 20. Editorial change to correct typographical error "portable" to "potable."
4.026	RETS 5.1, Responsibilities: "... Appendix A Specification 6.5."	Appendix B 4.1, Responsibilities: "... Appendix A Technical Specification 6.5."	Editorial change.
4.027	RETS 5.2, Procedures and Programs: "... Appendix A Specification 6.8.1."	Appendix B 4.2, Procedures and Programs: "... Appendix A Technical Specifications 6.8.1 and 6.8.4."	Editorial change referencing applicable Tech Spec sections.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.028	RETS 5.3.1, Special Reports: "... Appendix A Specification 6.9.2."	Appendix B 4.3.1, Special Reports: "... Appendix A Technical Specification 6.9.2. The ODCM also provides a listing of special reporting requirements."	Editorial change.
4.029	5.3.2.1, Semiannual Radioactive Effluent Release Report: "Routine Radioactive ... Reports ... previous 6 months of operation ... submitted within 60 days after January 1 and July 1 of each year. The period of the first quarter shall begin with the date of initial criticality. The Radioactive Effluent Reports ... unit as outlined ... RETS..."	Appendix B 4.3.2.1, Annual Radioactive Effluent Release Report: "The Annual Radioactive ... Report ... previous year of operation ... prior to May 1 of each year. The report ... unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50. A full listing of the information to be contained in the Annual Radioactive Effluent Release Report is provided in the ODCM."	The detailed routine reporting requirements are being relocated to the ODCM. A summary of the requirements will remain in Appendix B. These changes are consistent with GL 89-01. Other change includes frequency of the Radioactive Effluent Release Report from semiannually to annually in accordance with 10 CFR 50.36a.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.030	5.3.2.2, Annual Radiological Environmental Operating Report: "Routine Radiological Environmental Operating Reports ... radiological environmental surveillance activities for the report period including ... "	Appendix B 4.3.2.2, Annual Radiological Environmental Operating Report: "An annual Radiological Environmental Operating Report ... Radiological Environmental Monitoring Program for the report period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50. A full listing of the information to be contained in the Annual Radiological Environmental Operating Report is provided in the ODCM."	The detailed routine reporting requirements are being relocated to the ODCM. A summary of the requirements will remain in Appendix B. These changes are consistent with GL 89-01.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.031	RETS 5.7, Major Changes to Radioactive Liquid, Gaseous and Solid Waste Treatment Systems*: "... solid): 1. Shall be ... Semiannual ... * The information called for in this Specification will be submitted as part of the annual FSAR update."	Appendix B 4.3.3, Major Changes to Radioactive Liquid, Gaseous and Solid Waste Treatment Systems**: "... solid) shall be ... Annual ... ** The information called for in this Specification shall be submitted as part of the annual FSAR update."	Editorial changes including relocating this section to the Routine Reports section, 4.3.2; changing the frequency of the Radioactive Effluent Release Report from semiannually to annually in accordance with 10 CFR 50.36a; deleting "1" from the outline numbering scheme since there is no "2"; and changing the footnote "numbering" scheme to indicate more than one footnote on the new page.
4.032	RETS 5.7.1.d: "... predicted released ..."	Appendix B 4.3.3.d: "... predicted releases ..."	Editorial change to correct typographical error.
4.033	RETS 5.7.1.e: "... to individual ..."	Appendix B 4.3.3.e: "... to an individual ..."	Editorial change to correct typographical error.
4.034	RETS 5.4, Record Retention: "... radiological environmental monitoring program ... Appendix A Specification ..."	Appendix B 4.4, Record Retention: "... Radiological Environmental Monitoring Program ... Appendix A Technical Specification ..."	Editorial changes.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.035	RETS 5.5, Process Control Program, 5.5.2: "... Shall be submitted .... This submittal ... Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information ... change did not reduce the ... existing criteria for solid wastes, and c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC.... by the Resident Manager."	Appendix B 4.5, Process Control Program, 4.5.2: "... Shall be documented and records of reviews performed shall be retained as required by Appendix A Technical Specification 6.10.2.p. This documentation ... Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s); and ... change will maintain the ... existing requirements of Federal, State, or other applicable regulations.... by the PORC and the approval of the Resident Manager.... "	Changes consistent with GL 89-01.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.036	5.5.2: Not applicable	4.5.2.3: "Shall be submitted to the Commission as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the PCP was made. Each change shall be identified by marking in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented."	Current Appendix B Tech Specs 5.5.2.1 and 5.3.2.1 require changes to the PCP to be included in the Semiannual Radioactive Effluent Release Report. Therefore, although proposed Specification 4.5.2.3 is not required by GL 89-01, the requirement is consistent with other sections of the current Technical Specifications, and with the reporting requirements specified for changes to the ODCM by GL 89-01, with the exception that only the revised pages will be submitted rather than the entire PCP. Additionally, the frequency of the Radioactive Effluent Release Report is being changed from semiannually to annually in accordance with the change to 10 CFR 50.36a.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.037	RETS 5.6, Offsite Dose Calculation Manual (ODCM), 5.6.2: "... Shall be submitted .... This submittal ... Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s) ... change will not reduce the accuracy of reliability of dose calculations or set point determinations, and c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC.... the Resident Manager."	Appendix B 4.6, Offsite Dose Calculation Manual, 4.6.2: "... Shall be documented and records of reviews performed shall be retained as required by Appendix A Technical Specification 6.10.2.p. This documentation ... Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s) ... change will maintain the level of radioactive effluent control required pursuant to 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent dose or set point calculations ... the PORC and the approval of the Resident Manager."	Changes consistent with GL 89-01.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.038	5.6.2: Not applicable	4.6.2.3: "Shall be submitted to the Commission as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by marking in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented."	Current Appendix B Tech Specs 5.6.2.1 and 5.3.2.1 require changes to the ODCM to be included in the Semiannual Radioactive Effluent Release Report. This proposed addition to Technical Specifications is consistent with other sections of the current Technical Specifications, and with the reporting requirements specified for changes to the ODCM by GL 89-01, with the exception that only the revised pages will be submitted rather than the entire ODCM. Additionally, the frequency of the Radioactive Effluent Release Report is being changed from semiannually to annually in accordance with 10 CFR 50.36a.

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ITEM #	CURRENT DOCUMENT SECTION/ WORDING	PROPOSED DOCUMENT SECTION/WORDING	JUSTIFICATION FOR CHANGE(S)
4.039	RETS 5.8, Map Defining Unrestricted Areas for Radioactive Gaseous and Liquid Effluents: "... Figure 5.8-1.... 10 CFR 20.3 (a) (17).... The concept of UNRESTRICTED AREA ... LIMITING CONDITIONS FOR OPERATION ... achievable, pursuant to 10 CFR 50.36a."	Appendix B 4.7, Map Defining Unrestricted Areas for Radioactive Gaseous and Liquid Effluents: "... Figure 4.7-1.... 10 CFR 20.1003.... For calculations performed pursuant to 10 CFR Part 50.36a, the concept of UNRESTRICTED AREAS ... Radiological Effluent Controls ... achievable."	Changes consistent with 10 CFR Part 20 and the current Technical Specifications. Additionally, editorial change updating figure number.
4.040	RETS Figure 5.1-1, Map Defining Unrestricted Areas for Radioactive Gaseous and Liquid Effluents	Appendix B Figure 4.7-1, Map Defining Unrestricted Areas for Radioactive Gaseous and Liquid Effluents	New map replacing old resulting from change in definition of UNRESTRICTED AREA.

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Table 5: Miscellaneous

5.001	RETS 1.2 and 1.12, Definitions MAXIMUM PERMISSIBLE CONCENTRATION (MPC) and VENTING, respectively	Not Applicable	These definitions are being deleted from Appendix B. The terms are not used in Appendix B, Appendix A, nor in the proposed REC. The new terms EFFLUENT CONCENTRATION and MAXIMUM PERMISSIBLE CONCENTRATION WATER have been added to the REC (Section 1.5 and 1.8 respectively).
5.002	PCP 3.2.4 and 3.2.30 Plant Procedures RE-ADM-1-4 and RE-TRA-15-18	Not applicable	This is an administrative change to remove superseded procedures.
5.003	PCP 3.3.3 Richland (Washington) disposal site license	Not applicable	This is an administrative change; the Authority does not ship to Washington.
5.004	PCP 3.5.1 Pacific Nuclear Systems, Inc. Q.A. Manual...	Not applicable	This is an administrative change; the Authority does not use Pacific Nuclear Systems, Inc.
5.005	PCP 3.5.2 ...Topical Report No. TP-02-NP-1,	PCP 3.5.1...Topical Report No. TP-02-NP-A,	This is an administrative change to correct the report number.

ATTACHMENT IV TO IPN-99-079

PROPOSED CHANGES TO OFFSITE DOSE CALCULATION MANUAL (ODCM)

RESULTING FROM

PROPOSED CHANGES TO ENVIRONMENTAL TECHNICAL SPECIFICATIONS

INCORPORATING RECOMMENDATIONS OF GENERIC LETTER 89-01

AND THE REVISED 10 CFR PART 20 AND 10 CFR 50.36a

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64