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FACIL:50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Servic 05000305
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RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application to amend License DPR-43,providing Proposed Amend 66 to Tech Spec re specs & surveillance requirements for items concerning radioactive effluents & radiological environ monitoring program,per NUREG-0472.Fee paid.

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NRC-85-66

WISCONSIN PUBLIC SERVICE CORPORATION
P.O. Box 1200, Green Bay, WI 54305

March 29, 1985

Dr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
TAC #M08145
Proposed Amendment No. 66 to the KNPP Technical Specifications

References:
1) Letter from S. A. Varga (NRC) to C. W. Giesler (WPSC) dated April 20, 1984
2) NUREG 0472, Revision 3, Standard RETS for PWR's, September 1982
3) Letter from D. C. Hintz (WPSC) to S. A. Varga (NRC) dated August 21, 1984
4) Letter from D. C. Hintz (WPSC) to S. A. Varga (NRC) dated March 1, 1985
5) Letter from S. A. Varga (NRC) to D. C. Hintz (WPSC) dated February 19, 1985
6) Letter from D. C. Hintz (WPSC) to S. A. Varga (NRC) dated January 31, 1985
7) Letter from C. W. Giesler (WPSC) to H. R. Denton (NRC) dated August 24, 1983

Enclosed please find three (3) signed and notarized original transmittal letters and forty (40) copies of Proposed Amendment No. 66 to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications. This proposed amendment is being submitted upon the request of the NRC (reference 1) that Wisconsin Public Service

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Corporation (WPSC) adopt technical specifications consistent with the model Radiological Effluent Technical Specifications (RETS) as contained in NUREG 0472 (reference 2). The amendment is being transmitted to you in accordance with our commitments made in letters dated August 21, 1984 (reference 3) and March 1, 1985 (reference 4).

The proposed amendment provides specifications and surveillance requirements for items regarding radioactive effluents and the radiological environmental monitoring program. These requirements have been incorporated in the newly created Sections 7 and 8 to the KNPP Technical Specifications; and all existing technical specifications relating to this issue have been regrouped into these two sections. We had previously proposed this format in the meeting held in our office on July 31, 1984 and in our reference 3 letter, and understand that it is agreeable to you.

It is important to note that the Offsite Dose Calculation Manual (ODCM) serves as a basis for the proposed amendment and has already been approved by your staff (reference 5). The ODCM and the Radiological Environmental Monitoring Program (submitted by letter dated January 31, 1985) must be administratively revised to reflect the numbering system used in the proposed Sections 7 and 8. Aside from these revisions, and incorporating appropriate NRC comments, the content of these manuals is not expected to change.

The following technical specification pages are affected by the proposed amendment:

TSi	TS3.9-1 through 3.9-11	TS 6-16 through 6-28
TSii	TS4.10-1	Section 7
TSiii	TS4.11-1 through 4.11-4	Section 8
TSv	Table TS4.1-1 (page 3 of 5)	
TSvi	Table TS4.1-2	
TSvii	Table TS4.10-1	
TSviii	Table TS4.10-2	
TS1.1-4	Table TS4.11-1	
TS1.1-5	Table TS4.11-2	
TS1.1-6	TS 6-5	
TS1.1-7	TS 6-11	

A description of the specific changes, along with the appropriate safety evaluations and significant hazards determinations, are included in Enclosure I to this letter. Enclosure II provides a discussion of those items in our proposed amendment which differ significantly from the guidance provided in NUREG 0472. Also, cross references of the model RETS, the proposed technical specifications amendment, and the existing technical specifications have been provided in Enclosure III to aid in your review. Finally, Enclosure IV provides the affected pages of the proposed amendment.

The following pages are also affected by Proposed Amendment No. 55 (reference 7) which was submitted to you on August 24, 1983:

TS6-5
TS6-23
Table TS4.1-2

Finally, it is our intention to implement the proposed KNPP RETS by January 1, 1986, as previously stated in our reference 3 letter. Therefore, a timely review is necessary so that we may begin developing procedures and providing appropriate training regarding the new requirements.

As required by 10 CFR 50.91(b)(i), a copy of this application and significant hazards determination is being sent to the Public Service Commission of Wisconsin; and in accordance with the provisions of 10 CFR 170, a check for $150 is enclosed.

Very truly yours,

Carl W. Giesler
Vice President - Power Production

MSL:jks

Enc.

cc - Mr. S. A. Varga, US NRC
Mr. Robert Nelson, US NRC
Mr. R. S. Cullen, PSCW

Subscribed and Sworn to
Before Me This 29th Day
of March 1985

Jeanne M. Stein
Notary Public, State of Wisconsin

My Commission Expires:
June 28, 1987

50-305

ENCLOSURE TO PROPOSED AMENDMENT NO. 66 TO
KNPP TECHNICAL SPECIFICATIONS

Enclosure I

To Letter from C. W. Giesler to H. R. Denton

Dated March 29, 1985

Proposed Amendment No. 66 to the KNPP Technical Specifications

Description,
Safety Evaluation,
and
Significant Hazards Determination

Proposed Amendment No. 66 to the KNPP Technical Specifications

The specific changes in this proposed amendment along with their safety evaluations and significant hazards determinations are identified below.

Table of Contents

Pages TSi, TSii, TSiii, TSv, TSvi, TSvii, TSviii

Description of Changes

The table of contents for the technical specifications has been updated to reflect the proposed changes.

Safety Evaluation

Since these changes are purely administrative in nature, they do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Section 1.0, Definitions

Pages TS1.1-4, TS1.1-5, TS1.1-6 and TS1.1-7

Description of Changes

Definitions were added to this section for the following:

Source Check
Gaseous Radwaste Treatment System
Member(s) of the Public
Offsite Dose Calculation Manual
Process Control Program
Purge-Purging
Site Boundary
Solidification
Unrestricted Area
Venting
Ventilation Exhaust Treatment System
Radiological Environmental Monitoring Manual

Safety Evaluation

These definitions have been added to support the proposed KNPP radiological effluent technical specifications (RETS). The changes are consistent with the Standard RETS which have already been reviewed and approved by the NRC. Therefore, we have determined that they do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Section 3.0, Limiting Conditions for Operation

TS 3.9 Pages TS 3.9-1 through TS 3.9-11

Description of Change

Section 3.9, Radioactive Materials, has been deleted in its entirety and replaced with the proposed requirements of the newly added Sections 7 and 8.

Safety Evaluation

The deleted Section 3.9 is being replaced with specifications which are consistent with the Standard RETS and which provide a more stringent control over the operation of the KNPP. The Standard RETS have already been reviewed and approved by the NRC. We have therefore determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Section 4.0, Surveillance Requirements

TS 4.10 Page TS 4.10-1

Description of Change

Section 4.10, Environmental Monitoring, has been deleted in its entirety and replaced with the proposed requirements of the newly added Sections 7/8.7.

Safety Evaluation

The proposed Section 7/8.7 will assure a radiological environmental monitoring program which is consistent with the Standard RETS. Although, in general, the new requirements will relax the existing program requirements, they are clearly within the guidance reviewed and approved by the NRC, and therefore do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

TS 4.11 Pages TS 4.11-1 through TS 4.11-4

Description of Change

Section 4.11, Radioactive Materials, has been deleted in its entirety and replaced with the proposed requirements of the newly added Sections 7 and 8.

Safety Evaluation

The deleted Section 4.11 is being replaced with specifications which are consistent with the Standard RETS and which provide a more stringent control over the operation of the KNPP. The Standard RETS have already been reviewed and approved by the NRC. We have therefore determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Section 4.0, Surveillance Requirements - Tables

Table TS 4.1-1 (Page 3 of 5)

Description of Changes

Item 19, Radiation Monitoring System, has been revised to include surveillance requirements for only those radiation channels in which automatic actions occur or immediate operator actions are required to assure plant operating safety. Those appropriate channels which provide monitoring functions of radioactive effluents have been incorporated in the newly created Sections 7 and 8. Other radiation channels (channels 1 through 10, 20, 22 and 24) have been deleted from the technical specifications surveillance requirements.

Safety Evaluation

This change is consistent with the guidance of the Standard RETS which have been reviewed and approved by the NRC. Consistent with NRC guidance, this revision deletes from the technical specifications, surveillance requirements for those radiation channels which provide

no automatic actions or require no immediate operator action in response to alarms, or which provide no effluent monitoring functions for the RETS. Radiation channels R1 through R10 are area monitors, R20 is a service water process monitor, R22 monitors the RHR pump pit and R24 monitors the circulating water. This revision does provide a more stringent control over those radiation channels used to monitor radioactive effluents as part of the RETS. Those monitors with safety functions have been maintained in Section 4 of the Technical Specifications. We have determined that this change does not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Table TS 4.1-1 (Page 3 of 5)

Description of Change

The surveillance requirements for the environmental monitors have been deleted from the technical specifications.

Safety Evaluation

The environmental monitors provide no safety function for plant operations. Although this change relaxes the surveillance requirements for the monitors, as compared to our existing technical specifications, it is consistent with the Standard Technical Specifications which have already been reviewed and approved by the NRC. Therefore, we have determined that this change does not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Table TS 4.1-2

Description of Change

Items 8, 9, 10, 11, and 12 were deleted from this table. The appropriate sampling requirements for these monitors have been incorporated in the newly created Sections 7 and 8 to the technical specifications. As a result, the table notations have been renumbered and notations referencing the deleted items have also been deleted. The sampling requirements

for the secondary coolant (Item 7) have been revised to require gross 'Beta or Gamma' activity tests rather than gross 'Beta-Gamma'.

Safety Evaluation

Items 8, 9, 10, 11, and 12 have been incorporated in the proposed Sections 7 and 8 of the technical specifications consistent with the Standard RETS which have already been reviewed and approved by the NRC. The renumbering or deletions of notations is purely administrative in nature. The revision regarding the secondary coolant provides consistency between Section 4 and Sections 7 and 8 of the KNPP technical specifications, and is consistent with Standard Technical Specifications. We have therefore determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Table TS 4.10-1 (Pages 1 through 6) and Table TS 4.10-2

Description of Change

These tables have been deleted in their entirety from Section 4 of the technical specifications and replaced with Table 7.3 of the proposed Section 7 to the technical specifications. The sample locations have been included in the REMM.

Safety Evaluation

The same safety evaluation applies to this change as that found in the change made to Section 4.10.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Table TS 4.11-1 (Pages 1 and 2) and TS4.11-2 (pages 1 and 2)

Description of Change

These tables have been deleted in their entirety and replaced with tables in Sections 7 and 8 of the proposed technical specifications.

Safety Evaluation

The tables are being replaced with tables which are consistent with the Standard RETS. The Standard RETS have already been reviewed and approved by the NRC. Therefore, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Section 6.0, Administrative Controls

Pages TS 6-16 through TS 6-28

Description of Change

The above referenced pages have been renumbered to make use of the previously deleted and thus empty technical specification pages. No change to the contents of Sections 6.10, 6.11, 6.12, 6.13, 6.14 or 6.15 were made.

Safety Evaluations

These changes are purely administrative in nature, and therefore do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Section 6.5, Review and Audit

Page TS 6-5

Description of Change

The responsibilities of the PORC were expanded to require a review of changes made to the Process Control Program (PCP), the Offsite Dose Calculation Manual (ODCM), and the Radiological Environmental Monitoring Manual (REMM).

Safety Evaluation

This change results in a more stringent control over the operation of the KNPP and are consistent with the Standard RETS which have already been reviewed and approved by the NRC. Therefore, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Page TS 6-11

Description of Change

Plant audits, performed under the cognizance of the NSRAC, have been expanded to include audits of the radiological environmental monitoring program, the ODCM, and the PCP.

Safety Evaluation

This change results in a more stringent control over the operation of the KNPP and are consistent with the Standard RETS which have already been reviewed and approved by the NRC. Therefore, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Sections 6.16, 6.17, 6.18, 6.19

Description of Changes

The above referenced sections have been added to the existing technical specifications consistent with the Standard RETS. Specifically, the following additions have been made:

Section 6.16 requires written procedures covering the activities of the PCP, ODCM, and QA Program.

Section 6.17 provides approval and revision requirements of the PCP.

Section 6.18 provides approval and revision requirements of the ODCM.

Section 6.19 stipulates the requirements regarding major changes to radioactive waste systems.

Safety Evaluation

These additions to the KNPP Technical Specifications will result in a more stringent control over the operation of the KNPP. The requirements are consistent with the Standard RETS which have already been reviewed and approved by the NRC. Therefore, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Section 6.9, Reporting Requirements

Pages TS 6-19 through TS 6-23

Description of Change

The existing technical specifications regarding the "Unique Reporting Requirements" of the radiological environmental monitoring program and radioactive effluents (Sections 6.9.3.a and 6.9.3.b) have been replaced in their entirety by specifications which are consistent with the Standard RETS. As a result, the existing Section 6.9.3.c has been renumbered as Section 6.9.3.d.

Safety Evaluation

This change results in additional reporting requirements for the radiological effluent monitoring program and radioactive effluents at KNPP. These requirements are consistent with the Standard RETS which have already been reviewed and approved by the NRC. In addition, the renumbering of Section 6.9.3.c to 6.9.3.d is purely administrative in nature. We have therefore determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Sections 7/8.0 Radiological Effluent Technical Specifications and Surveillance Requirements

Description of Change

Sections 7 and 8 have been added to the KNPP Technical Specifications to provide requirements regarding radioactive effluents and the radiological environmental monitoring program.

Safety Evaluation

The KNPP RETS (Sections 7 and 8) have been added to the existing technical specifications upon the request of the NRC. This addition will result in a more stringent control over the operation of the KNPP. The additions are consistent with the Standard RETS which have already been reviewed and approved by the NRC. Therefore, we have determined that these changes do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Enclosure II

To Letter from C. W. Giesler to H. R. Denton

Dated March 29, 1985

Proposed Amendment No. 66 to the KNPP Technical Specifications

Major Deviations from the Standard RETS

The following provides a discussion of the instances where the Proposed Amendment No. 66 significantly deviates from the Standard RETS.

Explosive Gas Mixtures

The Standard RETS provide requirements regarding explosive gas mixtures in the waste gas holdup system. WPSC has not included this requirement as part of Proposed Amendment No. 66. Our current hydrogen/oxygen monitor is defunct, and explosive mixtures are now being assessed by manual grab samples when necessary. However, our staff is currently pursuing replacement equipment which would allow continuous monitoring if necessary. This replacement equipment will not be available by the January 1, 1986 implementation date for KNPP RETS. Therefore, WPSC will delay inclusion of this requirement until it is feasible to implement. We believe that this is justifiable based on the following:

1) The explosive gas mixture specification is not a requirement of regulations, but have been added to NRC guidance as recommendations.

2) WPSC has no similar requirements in the current technical specifications.

3) The NRC has stated that licensees are requested to meet the intent, rather than the letter, of the model RETS to minimize impacts on plant operations.

4) The NRC has stated that it is not the intent of the model RETS to require backfits for operating plants.

5) WPSC is actively pursuing replacement equipment which would allow implementation of this specification.

6) The specification will be submitted when it is feasible to implement, thus demonstrating our efforts to meet the intent of the model RETS.

Liquid Holdup Tanks

The Standard RETS provide specifications of the quantities of radioactive material contained in outdoor holdup tanks. WPSC has no liquid holdup tanks located outdoors at the KNPP. Therefore this specification is not applicable.

Maps

The Standard RETS require maps depicting the unrestricted areas for radioactive effluents. The maps provide no safety-related functions, but are required merely for information. WPSC believes that these maps would be more appropriately located in the ODCM. The ODCM is reviewed and approved by the NRC and its revisions are controlled in accordance with the proposed technical specifications.

The ODCM will be revised to include the appropriate maps prior to the January 1, 1986 implementation date.

Gas Storage Tanks

The NRC Standard Radiological Effluent Technical Specifications include a limit for the amount of radioactivity that can be stored in a single waste gas decay tank. This curie inventory limit is established to assure that, in the event of a tank failure releasing the entire radioactive contents to the environment, the resulting total body dose at the site boundary would not exceed 0.5 rem. For Kewaunee, the inventory limit on the waste gas storage tank has been established at 43,500* curies (Xe-133 equivalent).

An allowable primary coolant radioactivity concentration is established by the Technical Specifications which limit the primary coolant radioactivity concentration to 91/Ebar, with Ebar being the average energy (Mev) of the radioactivity. An upper primary coolant gross activity limit of about 182 uCi/ml is realizable with a conservative Ebar value of 0.5 Mev. By applying this activity concentration limit to the total liquid volume of the primary system (49,300 gal), a total activity limit of approximately 34,000 Ci can be determined.

Assuming a typical radionuclide distribution based upon the ANSI N237/ANS-18.1 source term, an equivalent Xe-133 inventory can be determined. Table 1 provides the typical noble gas distribution and the resulting Xe-133 equivalent concentration. The latter has been derived by multiplying the radionuclide concentration by the ratio of the nuclide total body dose factor to the Xe-133 total body dose factor. Summing all the individual radionuclide equivalent concentrations provides the overall Xe-133 equivalent concentration.

For determining concentration in a waste gas decay tank, a conservative assumption of 48 hours decay in degassing the primary system has been used to correct the primary coolant concentrations. The data show that the equivalent concentration (decay corrected) is less than the gross concentration (i.e.,19 uCi/gm gross in the primary coolant versus 14 uCi/gm equivalent). The resulting Xe-133 equivalent curie inventory for WGDT input is approximately 25,000 Ci.

It may be concluded therefore that: 1) the current waste gas decay tank inventory limitation of 43,500 Ci would not be exceeded even if the total primary system, containing an activity equal

* Kewaunee Technical Specifications, Amendment No. 47, 11/29/82 Section 3.9.b.7

to the Technical Specification 91/Ebar upper limit, was degassed into a single waste gas decay tank; and 2) the primary coolant system's radionuclide concentration limit (91/Ebar) represents a more limiting case. Based upon this evaluation, the curie inventory limit on a single waste gas storage tank has been deleted as a Radiological Effluent Technical Specification requirement.

Assumptions:

1) Primary System Volume = $(6591\ ft^3)(7.48\ gal/ft^3)$
= 49,300 gal
= 1.87E8 ml
2) Ebar = 0.5 Mev
3) ANS - 18.1 / ANSI N237 primary coolant source term

Table 1
Xe-133 Effective Concentration

	Primary Coolant (uCi/g)*	Half-life	Conc@ 48 hr decay	Dose Factor **	Ratio ***	Xe-133 Equiv@48hr (uCi/g)
Kr-83m	2.1E-2	1.9 hr	--	7.6E-8	--	--
Kr-85m	1.1E-1	4.5 hr	6.8E-5	1.2E-3	4.10	2.8E-4
Kr-85	1.5E-1	10.7 yr	1.5E-1	1.6E-5	0.06	9.0E-3
Kr-87	6.0E-2	76.3 min	--	5.2E-3	17.90	--
Kr-88	2.0E-1	2.8 hr	--	1.5E-2	51.70	--
Kr-89	5.0E-3	3.2 min	--	1.7E-2	58.60	--
Xe-131m	1.1E-1	12.0 da	9.8E-2	9.2E-5	0.32	3.1E-2
Xe-133m	2.2E-1	2.2 da	1.2E-1	2.5E-4	0.86	1.0E-1
Xe-133	1.8E+1	5.3 da	1.4E+1	2.9E-4	1.00	1.4E+1
Xe-135m	1.3E-2	16.0 min	--	3.1E-3	10.70	--
Xe-135	3.5E-1	9.1 hr	9.1E-3	1.8E-3	6.21	5.7E-2
Xe-137	9.0E-3	4.0 min	--	1.4E-3	4.83	
Xe-138	4.4E-2	17.0 min	--	8.8E-3	30.03	--
	1.9E+1		1.4E+1			1.4E+1

* Adapted from ANS-18.1/ANSI N237-1976, "Source Term Specification"
** Adapted from Regulatory Guide 1.109
*** Ratio = the total body dose factor divided by the Xe-133 dose factor

Enclosure III

To Letter from C. W. Giesler to H. R. Denton

Dated March 29, 1985

Cross References

Cross Reference I

npa - not presently addressed
n/a - not available

Affected Existing Ts Page	Existing TS Number	Model RETS	Proposed Amendment No. 66	Other
1.1-4	npa	1.16	1.0.i.4	
1.1-5	npa	1.6	1.0.o.1	
	npa	1.7	1.0.o.2	
	npa	1.8	1.0.o.3	
new TS page	npa	1.11	1.0.o.4	
TS 1.1-16	npa	1.12	1.0.o.5	
	npa	1.14	1.0.o.6	
	npa	1.15	1.0.o.7	
	npa	1.18	1.0.o.8	
	npa	1.19	1.0.o.9	
new TS page	npa	1.20	1.0.o.10	
TS 1.1-7	npa	n/a	1.0.o.11	
3.9-2	3.9.a.1	3.11.1.1	7.3.1	
	3.9.a.2	3.11.1.2	7.3.2	
	3.9.a.3	3.11.2.3 (3.11.2.1.b)	7.4.3 (7.4.1.b)	
	3.9.a.4	3.3.3.10 (Table 3.3-12)	7.1 (Table 7.1)	
	3.9.a.5.a	3.3.3.10	7.1	
	3.9.a.5.b	n/a	n/a	
	3.9.a.5.c	3.3.3.10 (Table 3.3-12)	7.1 (Table 7.1)	
	3.9.a.5.d	3.3.3.10/ 4.11.1.1.1	7.1/8.3.1.1	
3.9-3	3.9.a.6	3.11.1.3	7.3.3	
	3.9.a.7	3.11.1.4 (for outdoor tanks only)	n/a no outdoor tanks	
	3.9.a.8	3.11.1.2 (action)	7.3.2 (action)	
3.9-6	3.9.b.1	3.11.2	7.4.1	
	3.9.b.2	3.11.2.3	7.4.3	
	3.9.b.3.a	3.11.2.2.a	7.4.2.a	
	3.9.b.3.b	3.11.2.3.a/ 3.11.2.1.b	7.4.3.a/ 7.4.1.b	
	3.9.b.4.a	3.3.3.11	7.2 (Table 7.2)	
	3.9.b.4.b	3.3.3.11	7.2 (Table 7.2)	

Affected Existing Ts Page	Existing TS Number	Model RETS	Proposed Amendment No. 66	Other
3.9-7	3.9.b.4.c	3.3.3.11	7.2 (Table 7.2)	
	3.9.b.5	3.11.2.4	7.4.4	
	3.9.b.6	3.11.2.4	7.4.4	
	3.9.b.7	3.11.2.6	n/a (see justification)	
	3.9.b.8	3.11.2.4	7.4.4	
	3.9.b.9	3.11.2.2.b/ 4.11.2.2/ 3.11.2.4	7.4.2.b/8.4.2/ 7.4.4	
4.10-1	4.10.a	3.12.1/4.12.1	7.7.1/8.7.1	
	4.10.b	6.9.1.11	6.9.3.a.1	
4.11-1	4.11.a.1	n/a	n/a	
	4.11.a.2	4.11.1.1/4.11.1.2 Table 4.11-1	8.3.1.1/8.3.1.2 Table 8.3	
	4.11.a.3	4.11.1.1/ Table 4.11-1	8.3.1.1/ Table 8.3	
	4.11.a.4	4.3.3.10	8.1	
	4.11.a.5	n/a	n/a	
4.11-2	4.11.b.1	3.3.3.11	7.2	
	4.11.b.2	4.11.2.1.2	8.4.1.2	
	4.11.b.3	4.3.3.11/ Table 4.3-12	8.2/Table 8.1	
4.11-3	4.11.b.4.a	n/a	n/a	
	4.11.b.4.b	3.3.3.11/ Table 3.3-13	7.2/Table 7.2	
	4.11.b.5	3.3.3.11/ Table 3.3-13	7.2/Table 7.2	
	4.11.b.6	n/a	n/a	
	4.11.b.7	n/a	n/a	
	4.11.b.8	6.9.1.12	6.9.3.b.1	
Table TS4.1-1 (3 of 5)	Table TS4.1-1 #19	Table 4.3-12/ Table 4.3-13	Table TS4.1-1/ Tables 8.1, 8.2 (see Safety Evaluation)	
	#27	n/a	n/a	
Table TS4.1-2	Table TS4.1-2 #8	Table 4.11-1	Table 8.3	
	#9	Table 4.11-1	Table 8.3	
	#10	Table 4.11-2	Table 8.4	
	#11	Table 4.11-2	Table 8.4	
	#12	Table 4.11-2	Table 8.4	

Affected Existing Ts Page	Existing TS Number	Model RETS	Proposed Amendment No. 66	Other
Table TS 4.10-1 (Pages 1 thru 6)	Table TS 4.10-1	Table 3.12-1/ Table 4.12-1	Table 7.3/ Table 8.5	REMM
Table TS 4.10-2	Table TS 4.10-2	n/a	n/a	REMM
Table TS 4.11-1	Table TS 4.11-1	Table 4.11-1	Table 8.3	
Table TS 4.11-2	Table TS 4.11-2	Table 4.11-2	Table 8.4	
6-5	npa	6.5.1.6.l	6.5.1.6.j	
6-11	npa	6.5.2.8.k	6.5.3.8.h	
	npa	6.5.2.8.l	6.5.3.8.i	
	npa	6.5.2.8.m	6.5.3.8.j	
	6.5.3.8.d	6.5.2.8.n	6.5.3.8.d	
6-19	6.9.3.a.1	6.9.1.11	6.9.3.a.1.b	
	6.9.3.a.2	3.12.1 (action)/ 6.9.1.11	7.7.1(action)/ 6.9.3.a.1.a	
6-20	6.9.3.a.3	6.9.1.11	6.9.3.a.1.a	
	6.9.3.b.1	6.9.1.12	6.9.3.b.1.a	
6-22	6.9.3.b.2	6.9.1.12	6.9.3.b.1.a	
	npa	6.9.1.12	6.9.3.b.1.b	
	6.9.3.b.3	6.9.1.12	6.9.3.b.1.c	
	npa	6.9.1.12	6.9.3.b.1.d	
	npa	6.9.1.12	6.9.3.b.1.e	
	npa	6.9.2	6.9.3.c	
6-23	6.9.3.c	n/a	6.9.3.d	
New TS requirements	npa	6.8	6.16	
	npa	6.13	6.17	
	npa	6.14	6.18	
	npa	6.15	6.19	

Cross Reference II

n/a - not applicable

Model RETS NUREG 0472	Proposed Amendment #66	Existing TS No.	Other
1.0 Definitions			
1.1	not included		
1.2		1.0.i.3	
1.3		1.0.i.1	
1.4		1.0.i.2	
1.5	n/a		
1.6	1.0.o.1		
1.7	1.0.o.2		
1.8	1.0.o.3		
1.9		1.0.e	
1.10		1.0.j	
1.11	1.0.o.4		
1.12	1.0.o.5		
1.13		1.0.m	
1.14	1.0.o.6		
1.15	1.0.o.7		
1.16	1.0.i.4		
1.17	n/a	n/a	
1.18	1.0.o.8		
1.19	1.0.o.9		
1.20	1.0.0.10		
Table 1.2	Table 8.0		
3.0.1	7.0.1		
3.0.2	7.0.2		
3.0.3	7.0.3		
3.0.4	n/a	n/a	
4.0.1	8.0.1		
4.0.2	8.0.2		
4.0.3	8.0.3		
4.0.4	n/a	n/a	
3.3.3.10	7.1		
4.3.3.10	8.1		
Table 3.3-12	Table 7.1		
Table 4.3-12	Table 8.1		
3.3.3.11	7.2		
4.3.3.11	8.2		
Table 3.3-13	Table 7.2		
Table 4.3-13	Table 8.2		
3.11.1.1	7.3.1		
4.11.1.1	8.3.1.1		
4.11.1.2	8.3.1.2		

Model RETS NUREG 0472	Proposed Amendment #66	Existing TS No.	Other
Table 4.11-1	Table 8.3		
3.11.1.2	7.3.2		
4.11.1.2	8.3.2		
3.11.1.3	7.3.3		
4.11.1.3	8.3.3		
3.11.1.4	n/a		
4.11.1.4	n/a		
3.11.2.1	7.4.1		
4.11.2.1.1	8.4.1.1		
4.11.2.1.2	8.4.1.2		
Table 4.11-2	Table 8.4		
3.11.2.2	7.4.2		
4.11.2.2	8.4.2		
3.11.2.3	7.4.3		
4.11.2.3	8.4.3		
3.11.2.4	7.4.4		
4.11.2.4.1	8.4.4		
3.11.2.5	not included		
4.11.2.5	not included		
3.11.2.6	n/a--see justifications		
4.11.2.6	n/a--see justifications		
3.11.3	7.5		
4.11.3	8.5		
3.11.4	7.6		
4.11.4.1	8.6.1		
4.11.4.2	8.6.2		
3.12.1	7.7.1		
4.12.1	8.7.1		
Table 3.12-1	Table 7.3		
Table 3.12-2	Table 7.4		
Table 4.12-1	Table 8.5		
3.12.2	7.7.2		
4.12.2	8.7.2		
3.12.3	7.7.3		
4.12.3	8.7.3		
Basis			
3/4.3.3.10	7/8.1		
3/4.3.3.11	7/8.2		
3/4.11.1.1	7/8.3.1		
3/4.11.1.2	7/8.3.2		
3/4.11.1.3	7/8.3.3		
3/4.11.1.4	n/a		
3/4.11.2.1	7/8.4.1		
3/4.11.2.2	7/8.4.2		
3/4.11.2.3	7/8.4.3		
3/4.11.2.4	7/8.4.4		
3/4.11.2.5	n/a		
3/4.11.2.6	n/a		

Model RETS NUREG 0472	Proposed Amendment #66	Existing TS No.	Other
3/4.11.3	7/8.5		
3/4.11.4	7/8.6		
3/4.12.1	7/8.7.1		
3/4.12.2	7/8.7.2		
3/4.12.3	7/8.7.3		
5.1.3	n/a	n/a	ODCM
Figure 5.1-3	n/a	n/a	ODCM
6.5.1.6.k		6.6.1	
6.5.1.6.l	6.5.1.6.j		
6.5.2.8.k	6.5.3.8.h		
6.5.2.8.l	6.5.3.8.i		
6.5.2.8.m	6.5.3.8.j		
6.5.2.8.n		6.5.3.8.d	
6.8.1.g	6.16.a		
6.8.1.h	6.16.b		
6.8.1.i	6.16.c		
6.9.1	n/a	6.9.1	
6.9.1.9.a	n/a	6.9.1	
6.9.1.9.b	n/a	6.9.1	
6.9.1.9.c	n/a	6.9.1	
6.9.1.9.d	n/a	6.9.1	
6.9.1.11	6.9.3.a		
6.9.1.12	6.9.3.b		
6.9.2	6.9.3.c		
6.10.2.n		6.10.1.j	
6.13.1	6.16.1		
6.13.2	6.16.2		
6.14.1	6.18.1		
6.14.2	6.18.2		
6.15	6.19		