

Director of NRR
November 24, 1982
Exhibit A

PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS

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C. Environmental Reports

The reports listed below shall be submitted to the Administrator of the appropriate Regional Office or designate:

1. Annual Radiation Environmental Monitoring Report

- a. Annual Radiation Environmental Monitoring Reports covering the operation of the program during the previous calendar year shall be submitted prior to May 1 of each year.
- b. The Annual Radiation Environmental Monitoring Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous environmental surveillance reports and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use consensus required by Specification 4.16.B.1. If harmful effects or evidence of irreversible damage are detected by the monitoring, the report shall provide an analysis of the problem and a planned course of action to alleviate the problem.
- c. The Annual Radiation Environmental Monitoring Reports shall include summarized and tabulated results in the format of Regulatory Guide 4.8, December-1975 of all radiological environmental samples taken during the report period. In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.
- d. The reports shall also include the following: a summary description of the radiological environmental monitoring program; a map of all sampling locations keyed to a table giving distances and directions from the reactor; and the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 4.16.C.1.

2. Special Reports

- a. When radioactivity levels in samples exceed limits specified in Table 4.16.3 a Special Report shall be submitted within 30 days from the end of the affected calendar quarter. For certain cases involving long analysis time, determination of quarterly averages may extend beyond the 30 day period. In these cases the potential for exceeding the quarterly limits will be reported within the 30 day period to be followed by the Special Report as soon as practicable.

3. Other Environmental Reports (non-radiological, non-aquatic)

Written reports for the following items shall be submitted to the appropriate NRC Regional Administrator:

- a. Environmental events that indicate or could result in a significant environmental impact causally related to plant operation. The following are examples: excessive bird impact; onsite plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; increase in nuisance organisms or conditions; or excessive environmental impact caused by herbicide application to transmission corridors associated with the plant. This report shall be submitted within 30 days of the event and shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.
- b. Proposed changes, tests or experiments which may result in a significant increase in any adverse environmental impact which was not previously reviewed or evaluated in the Final Environmental Statement or supplements thereto. This report shall include an evaluation of the environmental impact of the proposed activity and shall be submitted 30 days prior to implementing the proposed change, test or experiment.

6.8 ENVIRONMENTAL QUALIFICATION

- A. By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment", December 1979. Copies of these documents are attached to Order for Modification of License DPR-22 dated October 24, 1980.
- B. By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

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Attachment

MONTICELLO NPDES PERMIT