

Humboldt Bay ISFSI Amendment 3 Technical Specification Page Changes

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## 5.0 ADMINISTRATIVE CONTROLS

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### 5.1 Administrative Programs

The following programs shall be established, implemented, and maintained:

#### 5.1.1 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these TS.

- a. Changes to the TS Bases shall be made under appropriate administrative controls and reviews.
- b. Changes to the TS Bases may be made without prior NRC approval in accordance with the criteria in 10 CFR 72.48.
- c. The TS Bases Control Program shall contain provisions to ensure that the TS Bases are maintained consistent with the Humboldt Bay ISFSI SAR.
- d. Proposed changes that do not meet the criteria of 5.1.1.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the TS Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 72.48 (d) (2).

#### 5.1.2 Radioactive Effluent Control Program

- a. This program is established and maintained to implement the requirements of 10 CFR 72.44 (d) or 72.126, as appropriate.
- b. This program will provide limits on surface contamination of the OVERPACK and GTCC cask and verification of meeting those limits prior to removal of a loaded OVERPACK or GTCC cask from the refueling building.

#### 5.1.3 MPC-HB and SFSC Loading, Unloading, and Preparation Program

This program shall be established and maintained to implement Humboldt Bay ISFSI SAR Section 10.2 requirements for loading fuel and components into MPC-HBs, unloading fuel and components from MPC-HBs, and preparing the MPC-HBs for storage in the SFSCs. The requirements of the program for loading and preparing the MPC-HB shall be complete prior to removing the MPC-HB from the Refueling Building. The program provides for evaluation and control of the following requirements during the applicable operation:

- a. Verify that the acceptance criteria for drying are met to ensure short term fuel temperature limits are not violated and the MPC-HB and OVERPACK are adequately dry.
- b. Verify that the MPC-HB and OVERPACK inerting backfill pressures and purity assure adequate heat transfer and corrosion control.
- c. Verify that leak testing assures adequate OVERPACK integrity.
- d. Verify surface dose rates on the SFSCs are consistent with the offsite dose analysis.
- e. During MPC-HB re-flooding, verify the MPC cavity bulk helium temperature is such that water quenching or flashing does not occur.
- f. Loading is to be independently verified by a cognizant engineer to ensure that the fuel assemblies in the MPCs are placed in accordance with the original loading plan.

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