

ADMINISTRATIVE CONTROLS

- g. PROCESS CONTROL PROGRAM implementation.*
- h. OFFSITE DOSE CALCULATION MANUAL implementation.
- i. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 4.15 Rev. 1, February 1979.

NOTE: Quality Assurance Program for effluent and environmental monitoring and sampling shall be in accordance with Regulatory Guide 4.15, December, 1977 prior to first exceeding 5% RATED THERMAL POWER or July 1, 1982, whichever occurs first; subsequent to this time the Quality Assurance Program shall be in accordance with Regulatory Guide 4.15, Rev. 1, February, 1979.

- j. Modification of Core Protection Calculator (CPC) Addressable Constants.

NOTE: Modification to the CPC addressable constants based on information obtained through the Plant Computer - CPC data link shall not be made without prior approval of the Onsite Review Committee.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be approved by the Station Manager; or by (1) the Manager, Operations (2) the Manager, Technical (3) the Manager, Maintenance, (4) the Deputy Station Manager, or (5) the Manager, Health Physics as previously designated by the Station Manager; prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed and approved by the Station Manager; or by (1) the Deputy Station Manager, (2) the Manager, Operations, (3) the Manager, Maintenance, (4) the Manager, Technical, or (5) the Manager, Health Physics as previously designated by the Station Manager; within 14 days of implementation.

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

- a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the high pressure safety injection recirculation, the shutdown cooling system, the reactor coolant sampling system (post-accident sampling piping only), the containment spray system, the radioactive waste gas system (post-accident sampling return piping only) and the liquid radwaste system (post-accident sampling return piping only). The program shall include the following:

- (i) Preventive maintenance and periodic visual inspection requirements, and
- (ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

*See Specification 6.13.1

DESCRIPTION OF PROPOSED CHANGE NPF-10-44 AND SAFETY ANALYSIS
OPERATING LICENSE NPF-10

This is a request to revise Appendix "A" Technical Specification 6.12.

Existing Specification

See Attachment A.

Proposed Specification

6.12.3 During periods when the reactor is in Modes 1, 2, 3, and 4 and when the reactor is in Mode 5 for less than 15 consecutive days, posting and locking (or otherwise securing) the access points to reactor containment may be substituted for the requirements for posting and barricading in 6.12.1 and the requirements for posting, locking, roping off, and providing flashing red lights in 6.12.2. Access to the reactor containment is permitted with the approval of the Shift Supervisor on duty and/or Health Physics Supervisor.

Reason for Proposed Change

The proposed change clarifies the requirement regarding access control to high radiation areas inside containment during operation in modes requiring containment integrity. Region V inspectors have requested such clarification.

Safety Analysis

Containment access control during Modes 1 through 4 and following initial entry into Mode 5, provides adequate control of access to high radiation areas inside containment without having to barricade, post, lock, rope off such areas or to provide flashing lights as warning against entry into such areas. Accordingly, it is concluded that: (1) Proposed Change NPF-10-44 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change and (3) this action will not result in a condition which significantly alters the impact of the Station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT A

ADMINISTRATIVE CONTROLS

- 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 OSRC and the NSG.
- l. Records of the service lives of all snubbers listed in Tables 3.7-4a and 3.7-4b including the date at which the service life commences and associated installation and maintenance records.
- m. Records of secondary water sampling and water quality.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation 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 Exposure Permit (REP)*. Any individual or group of individuals permitted to enter such areas shall be provided with 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.

*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the REP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following approved plant radiation protection procedures for entry into high radiation areas.

ADMINISTRATIVE CONTROLS

- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device who is 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 Exposure Permit.

6.12.2 In addition to the requirements of 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in one 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 health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved REP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem** that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the REP, direct or remote (such as use of closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

6.13 PROCESS CONTROL PROGRAM (PCP)

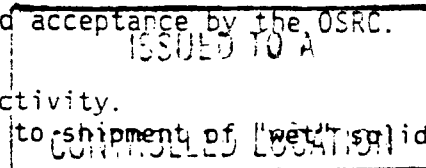
6.13.1 The PCP shall be approved by the Commission prior to implementation.#

6.13.2 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the semi-annual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the OSRC.
2. Shall become effective upon review and acceptance by the OSRC.

**Measurement made at 18" from source of radioactivity.

#The PCP shall be submitted and approved prior to shipment of wet solid radioactive waste.



DESCRIPTION OF PROPOSED CHANGE NPF-10-46 AND SAFETY ANALYSIS
OPERATING LICENSE NPF-10

This is a request to revise Appendix "A" Technical Specification 3.3.4.

Turbine Overspeed Protection

Existing Specification

Applicability Modes 1, 2, and 3

Proposed Specification

Applicability Modes 1, 2*, and 3*

*With any main steam isolation valve or its bypass not fully closed.

Reason For Proposed Change

On October 6, 1982 we anticipate the need to enter MODE 3 to resume startup testing. The turbine control valves are presently undergoing repairs which cannot be completed by this date. Technical Specification 3.3.4 presently would prohibit entry into MODE 3 with these turbine control valves inoperable. This proposed change will allow entry into MODES 3 and 2 while preventing the possibility of turbine overspeed by requiring that the Main Steam Isolation Valves and the Main Steam Isolation Valve Bypasses remain closed while the Turbine Overspeed Protection System is inoperable.

Safety Analysis

The basis for the turbine overspeed protection system limiting condition for operation is to ensure that the probability of turbine missiles being generated is acceptably low. The original Limiting Condition for Operation (LCO) requires isolation of steam from the turbine by closure of the turbine stop or control valves or the MSIV and Bypass MSIV valves when the overspeed protection system is inoperable. The revised LCO which allows continued operation and mode changes with the MSIVs and MSIV Bypass valves shut when the overspeed protection system is inoperable provides protection identical to that in the original specification.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-46 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.