

DESCRIPTION OF PROPOSED CHANGE AND SAFETY ANALYSIS  
PROPOSED CHANGE NO. 112 TO THE TECHNICAL SPECIFICATIONS  
PROVISIONAL OPERATING LICENSE DPR-13

This is a request for revision of Appendix A, Technical Specifications, and to amend the license thereby.

Reason for Proposed Change

The present wording in Section 6.11, "Radiation Protection Program" of the Technical Specifications is inadequate compared with NUREG-0452, Revision 4, Standard Technical Specifications for Westinghouse Pressurized Water Reactors. It implies use of only those high radiation area access control methods described in 10CFR Part 20, Section 20.203(c)2. The proposed change enables the substitution (with Commission approval) of improved alternative control methods. This substitution is in accordance with 10CFR Part 20, Section 20.203(c)5.

Existing Specifications

The existing specifications are as constituted in Appendix A, Technical Specifications, Section 6.11, "Radiation Protection Program".

Proposed Specifications

The proposed specifications are those of NUREG-0452, Revision 4, Standard Technical Specifications for Westinghouse Pressurized Water Reactors. New Section 6.11 is provided in the Enclosure.

Safety Analysis

The proposed changes incorporate the use of improved physical and administrative methods to control possible access to high radiation areas. No changes are made to the plant operational margins.

Based upon the analysis provided above, it is concluded that (1) the proposed change does not involve an unreviewed safety question as defined in 10CFR50.59, nor does it present significant hazards considerations not described or implicit in the Final Safety Analysis, and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change.

ENCLOSURE6.11 RADIATION PROTECTION PROGRAM

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

6.11.1 High Radiation Area (Radiation level between 100 mrem/hr and 1,000 mrem/hr.)

In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10CFR20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1,000 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).<sup>\*</sup> 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.
- 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.

\* 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.

#### 6.11.2 High Radiation Area (Radiation level above 1,000 mrem/hr)

In addition to the requirements of 6.11.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1,000 mrem shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Watch Engineer 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 1,000 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 unless a health physics technician is in continuous attendance, 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.

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