REQUEST FOR ADDITIONAL INFORMATION

WATTS BAR UNIT 2

ODCM REVIEW

1. Surveillance Requirement 2.0.2 is not adequate to prevent surveillance frequency "creep" (e.g., an annual surveillance could be performed every 15 months indefinitely and still meet this ODCM requirement as written). In addition to the 1.25 times the frequency interval grace period provided in paragraph 4.0.2.a of NUREG 1301, paragraph 4.0.2.b specifies that three consecutive surveillances not exceed 3.25 times the applicable surveillance frequency interval. Revise the ODCM in accordance with (IAW) NUREG 1301 4.0.2.b or provide a technical justification demonstrating the adequacy of the current deviation.

2. Surveillance Requirement 2.0.2 is not IAW NUREG 1301 paragraph 4.0.3 which specifies that the time limit for an Action Requirement start at the time the non-performance of the surveillance is identified, but then allows a delay of 24 hours to complete the surveillance. Revise the ODCM IAW NUREG 1301 paragraph 4.0.3, or provide a technical justification demonstrating the adequacy of the current deviation.

3. Tables 2.1-1 and 2.1-2 are not IAW NUREG 1301, Tables 4.3-8 and 4.3-9, respectively, in that several Channel Operational Test (COT) frequency intervals are listed as every 276 days (3Q) instead of every 92 days (Q) per NUREG 1301 (see ODCM Table 3.1for surveillance frequency designations). Also, this deviation from NUREG 1301 is not identified and discussed in ODCM Appendix B. Provide a technical basis demonstrating the adequacy of this relaxation of the COT frequency, or revise the ODCM IAW NUREG 1301.

4. Table 2.1-1 footnotes (5) & (6) are not IAW NUREG 1301, Table 4.3-8 in that they inappropriately limit the scope of the COT. Provide a technical basis for this narrowing of the COT scope, or revise the ODCM IAW NUREG 1301.

5. Tables 1.1-2 and 2.1-2 indicate that the operability and surveillance requirements (respectively) for the Condenser Vacuum Exhaust Iodine and Particulate monitor were deleted in revision 5 to the ODCM. Revise the ODCM IAW NUREG 1301 with appropriate operability and surveillance requirements for this monitor, or provide a technical basis demonstrating the adequacy of the current deviation.

6. Foot notes (6), (7) & (10) to Table 1.1-2 all allow their respective monitors to be considered operable without isokinetic sampling. Provide a technical basis for determining that these monitors will provide representative sampling.

7. Foot note (5) to Table 1.1-2 states that the operability requirement for the Shield Building Iodine/Particulate monitor "applies to charcoal and particulate filters, does not apply to detection channels." Define an operable charcoal or particulate filter. Provide a technical basis for why the detection channel for this monitor does not have to be operable.

8. Table 2.1-2 is not IAW NUREG 1301, Table 4.3-9 in that it does not specify weekly channel checks for the iodine/particulate monitors. The discussion in ODCM Appendix B item 3 does not explain how weekly detection channel tests are redundant with daily flow checks, and therefore are not applicable. Provide a revised technical basis for this deviation from NUREG 1301 or revise the ODCM IAW NUREG 1301.

9. Table 2.2-1 is not IAW NUREG 1301, Table 4.11-1in that the frequency of sampling continuous liquid effluent releases are specified as daily, monthly and quarterly grab samples instead of the continuously collected composite samples specified in NUREG 1301. ODCM Appendix B item 5 identifies this as a deviation from NUREG 1301. However the only basis given is that it is consistent with the SQN effluents program. This is not an adequate basis. Provide an adequate technical basis as to how representative samples are collected from the WBN liquid release streams or revise the ODCM IAW NUREG 1301.

10. Table 2.2-2, foot notes 3 & 7, are not IAW NUREG 1301. ODCM Appendix B item 6 identifies this as a deviation from NUREG 1301. However the only basis given is that it is consistent with the SQN effluents program. This is not an adequate basis. Provide an adequate technical basis as to how noble gas samples are collected from the WBN following reactor power changes or revise the ODCM IAW NUREG 1301.

11. Table 2.3-1, foot note 8 appears to be inconsistent with groundwater sampling specified in Table 9.1. Explain and/or resolve this apparent conflict.

12. Surveillance Requirement 2.3.3 erroneously states that the Interlaboratory Comparison Program is described in ODCM Section 9.0. The description contained in ODCM Section 9.4 "Interlaboratory Comparison Program," is inadequate in that it provides little more than a restatement of the requirement in Control 1.3.3 and Surveillance Requirement 2.3.3. Revise the ODCM IAW NUREG 1301 paragraph 4.12.3. In addition, ODCM Section 9.4 contains a reference to providing an "EPA program code designation" in lieu of a results summary. Delete this reference or provide a technical basis for why this is acceptable.

13. The list of radioactive materials at the bottom of page 51 appears to be missing C-14. Correct or explain why appropriate.

14. Appendix C, the ODCM Revision Process item 1.2 can be read to imply incorrectly that the acceptance criteria in 10 CFR 50.59 apply to the ODCM revision process (See 10

CFR 50.59(b)(4), and NEI 96-07 Rev.1, for guidance on 10 CFR 50.59 implementation). Revise the change process in ODCM Appendix C or provide a justification why no change is appropriate.

15. Equation 6.11: the subscript Wai to the variable A, in this equation should be revised to read Waij to indicate that it is organ specific. Correct or explain why appropriate.

16. Table 9.1 is not IAW NUREG 1301, Table 3.12-1in that:

    a. No control samples are provided for milk, fish, or food products;

    b. Only one sample of a commercially important, and one sample of a recreationally important, fish species is provided where as NUREG 1301specifies one sample of each fish species that is commercially or recreationally important;

    c. The frequency of sampling food products does not specify enhanced sampling for products that are harvested more than once a year IAW NUREG 1301, Table 3.12-1, foot note (9).

    Revise the ODCM IAW NUREG 1301, Table 3.12-1, or provide a technical justification demonstrating the adequacy of each of the above deviations.

17. Table 9.2 locations for milk sampling, are not consistent with the information in WBN2 FSAR, Table 11.3-8. Resolve this inconsistency, or provide a technical basis why no change is appropriate.

18. Foot note 1 to Table 9.1 indicates that REMP monitoring sample locations are given in Table 9.2. However, no locations for food product sampling are included in Table 9.2. In addition, Table 11.3-8 of the FSAR gives 16 garden locations as dose pathway “points of interest” near the plant. Resolve these inconsistencies, or provide a technical basis why no change is appropriate.

19. ODCM Appendix B items 6.h & j, discuss the basis for sampling requirements in Table 2.2-2 (associated with the TPBAR operations) that appear to have been deleted in ODCM revision 11 (items H, I, & J?). Correct or explain why it is not appropriate for this combined ODCM to address the gaseous effluent sampling associated with the TPBARs.

20. ODCM Appendix B item 11, gives the basis for Controls/Surveillance Requirement 1/2.2.1.4 which is not in the current draft of the ODCM. Correct or explain why appropriate.

21. ODCM Appendix B item 15, states that the definition of a member of the public is consistent with 10 CFR 20, not NUREG 1301, as a basis for establishing the WBN unrestricted area boundary on opposite side of the Tennessee River (as indicated on

Figure 3.1). Does the licensee have the legal authority to limit or control access to the Tennessee River consistent with the Part 20 definition of the controlled area? Provide a technical basis, and justification, for including a navigable river within the WBN controlled area.