

CHANGES TO ODCM, PCP, AND
RADIOACTIVE WASTE SYSTEMS

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I. CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

There was a change to the ODCM during this reporting period. A summary of the changes are shown below. A complete copy of the updated ODCM is being forwarded under separate letter.

ODCM REVISION 15
REASON FOR CHANGE

1. The Cover Page was changed to designate the approval authority as the Plant Manager as per Improved Standard Technical Specifications.
2. In Section 2.2 "Requirements for Compliance with 10 CFR Part 20 - Radioactive Materials in Liquid Effluents" on Page 2-8, Section 2.2.3, is being deleted. This step (2.2.3) is being deleted because step 2.2.2 directs the plant to do whatever is necessary to bring the release rate to within limits without delay. Step 2.2.3 is also not a requirement of NUREG 1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors". NUREG 1301 provides guidance that shutdown requirements are not applicable when exceeding the liquid release limits of the equivalent of step 2.2.2. Step 2.2.4 was renumbered to Step 2.2.3 to reflect the deletion of existing Step 2.2.3.
3. In Table 2.6-1 on Page 2-26, Item 1.a, RMS-18 is being changed to R-18. This change is being made to make the designation in the ODCM consistent with the UFSAR.
4. In Table 2.6-1 on Page 2-27, Item 2.a, RMS-19A, B, and C is being changed to R-19A, B, and C. This change is being made to make the designation in the ODCM consistent with the UFSAR.
5. In Table 2.6-1 on Page 2-29, Item 1.a, RMS-16 is being changed to R-16. This change is being made to make the designation in the ODCM consistent with the UFSAR.
6. In Table 2.7-1 on Page 2-32: Item 1.a, RMS-18 is being changed to R-18, Item 2, RMS-19A, B, and C was changed to R-19 A, B, and C and in Item 3.a RMS-16 was changed to R-16 . These changes are being made to make the designation in the ODCM consistent with the UFSAR Item 5, Condensate Polisher Waste Monitor (R-37), was added as a corrective action for CR 96-03039.
7. In Section 3.2, on page 3-15, "Requirements for Compliance with 10 CFR Part 20 - Radioactive Materials in Gaseous Effluents" on Page 3-15, Step 3.2.3, is being deleted. This step (3.2.3) is being deleted because step 3.2.2 directs the plant to do whatever is necessary to bring the release rate to within limits without delay. Step 3.2.3 is also not a requirement of NUREG 1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors". NUREG 1301 provides guidance that shutdown requirements are not applicable when exceeding the gaseous release limits of the equivalent of step 3.2.2.
8. In Section 3.6, "METHODOLOGY FOR R-11 SETPOINT (Air Particulate)", Step 3.6.1, there are two places where RMS-11 is being changed to R-11. This change is being made to make the designation in the ODCM consistent with the UFSAR.

9. In Table 3.10-1, Page 3-90, Item 1, RMS-14 is being changed to R-14. This change is being made to make the designation in the ODCM consistent with the UFSAR.
10. In Table 3.10-1, Page 3-92, Item 2.a, RMS-12 was changed to R-12. This change is being made to make the designation in the ODCM consistent with the UFSAR. The footnote indicated by "***" was deleted as it was a one time only condition that was allowed during RFO-13.
11. In Table 3.10-1, Page 3-93, Items 2.a, and 2.b, RMS-11 was changed to R-11. This change is being made to make the designation in the ODCM consistent with the UFSAR. The footnote indicated by "***" was deleted as it was a one time only condition that was allowed during RFO-13.
12. In Table 3.10-1, Page 3-94, Items 3.a and 3.b, RMS-20 was changed to R-20. This change is being made to make the designation in the ODCM consistent with the UFSAR.
13. In Table 3.10-1, Page 3-94, Items 4.a and 4.b, RMS-21 was changed to R-21. This change is being made to make the designation in the ODCM consistent with the UFSAR.
14. In Table 3.10-1, Page 3-95, Items 3.a and 3.b, RMS-20 was changed to R-20. This change is being made to make the designation in the ODCM consistent with the UFSAR.
15. In Table 3.11-1, Page 3-97: In Item 1, RMS-14 was changed to R-14, In Item 2, RMS-11 and RMS-12 was changed to R-11 and R-12, respectively, In Item 3, RMS-20 was changed to R-20, and in Item 4, RMS-21 was changed to R-21. These changes were made to make the designation in the ODCM consistent with the UFSAR.
16. In Table 3.12-1, on page 3-101, "Table Notation", Item b, RMS-11 was changed to R-11. This change is being made to make the designation in the ODCM consistent with the UFSAR.
17. In Table 4.5-1, on page 4-19, "H. B. Robinson Radiological Environmental Monitoring Program", Item 2, point 56 was added. Point 56 is a TLD used for measurement in the ISFSI environmental program.
18. In Table 4.5-1, on page 4-19, "H. B. Robinson Radiological Environmental Monitoring Program", Item 3.b, Groundwater, Point 43 (Unit 2 deep well) was combined with point 42 (Unit 1 deep well). This was combined to permit sampling either Unit 1 or Unit 2 deep well. This change is consistent with ODCM Table 4.1-1 (relocated from old Technical Specifications in to the ODCM). Table 4.1-1 requires 2 groundwater samples compared to Table 4.5-1 which required 3 groundwater samples. This still requires sampling from the Artesian well at 0.6 miles ESE.
19. In Table 4.5-1, on page 4-19, "H. B. Robinson Radiological Environmental Monitoring Program", Item 3.b, Groundwater, the sample frequency was changed from monthly to quarterly. This change is consistent with ODCM Table 4.1-1 (relocated from old Technical Specifications in to the ODCM) and with NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors".

20. Page 5-1, Section 5.0, Step 5.1, required that analyses performed for the Interlaboratory Comparison Program be performed on radioactive materials supplied by EPA. This was changed to remove the requirement that radioactive materials for the program be supplied by EPA. This was done because the EPA no longer provides this service. The program will use radioactive materials supplied by vendor.

II. CHANGES TO THE RADIOACTIVE WASTE SYSTEMS

There were no changes to the Radioactive Waste System during this reporting period.

III. CHANGES TO THE PROCESS CONTROL PROGRAM (PCP)

There was no change to the PCP during this reporting period.

IV. CHANGES TO THE LAND USE CENSUS

There were no changes to the environmental sampling program as a result of the Land Use Census performed in 1998.

V. INSTRUMENT INOPERABILITY

There was a reportable instrumentation inoperability event during this reporting period. The Gas Analyzer was declared out of service on March 30, 1998 at 1742 due to a lack of inlet sample pressure and a problem with the sample sequencing / timing logic. Repairs to the analyzer required the replacement of parts which are no longer available. The time necessary to document and procure the new parts caused the monitor to be unavailable greater than fourteen days.

The analyzer was returned to service on April 14, 1998 at 1735. During the period of the inoperability, compensatory monitoring of the in-service Waste Gas Decay Tank was performed as required by the Technical Requirements Manual , Section 3.11.

VI. LIQUID HOLDUP TANK CURIE LIMIT

There were no outside liquid holdup tanks that exceeded the ten curie limit during this reporting period.

VII. WASTE GAS DECAY TANK CURIE LIMIT

There were no waste gas decay tanks with a curie content that exceeded the 1.90E+04 curie limit during this reporting period.

SUPPLEMENTS TO PREVIOUS
REPORTS

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I. DISCUSSION

There are corrections to previous reports that are discussed and reported below.

The reports submitted for: January 1, 1995 through June 30, 1995, July 1, 1995 through December 31, 1995, January 1, 1996 through June 30, 1996, July 1, 1996 through December 31, 1996, January 1, 1997 through June 30, 1997, and January 1, 1997 through December 31, have a common transposition error in the solid waste shipping sections. Although the solid radioactive waste volumes were accurately reported, the error associated with the volumes was incorrectly reported. The percent error for the total curie determination was reported for the volume determination. Corrected pages for the affected reports are included on the following pages.

V. SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
 REPORT TIME PERIOD JANUARY 1 THROUGH JUNE 30, 1995

A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

WASTE CLASS A

Type of Waste	Unit	6-Month Period	Est. Total Error (%)	Solid. Agent	Cont. Type	Form	No. Ship.
a. Spent resins, filter sludges, evaporator bottoms, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
b. Dry compressible waste, contaminated equip, etc	m ³ Ci	3.24E+01 1.58E-01	1.00E+00 2.29E+01	NONE	STP	Compacted & Incinerated	58
c. Irradiated components, control rods, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
d. Other (describe)	m ³ Ci	NA	NA	NA	NA	NA	NA

STP = Strong Tight Package

V. SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
 REPORT TIME PERIOD JULY 1, 1995, THROUGH DECEMBER 31, 1995

A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

WASTE CLASS A

Type of Waste	Unit	6-Month Period	Est. Total Error (%)	Solid. Agent	Cont. Type	Form	No. Ship.
a. Spent resins, filter sludges, evaporator bottoms, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
b. Dry compressible waste, contaminated equip, etc	m ³ Ci	1.17E+01 9.90E-01	1.00E+00 2.29E+01	NA	STP	Compacted / Uncompacted / Incinerable	27
c. Irradiated components, control rods, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
d. Other (describe)	m ³ Ci	NA	NA	NA	NA	NA	NA

STP = Strong Tight Package

V. SOLID WASTE AND IRRADIATED FUEL SHIPMENTS (continued)

B. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

WASTE CLASS C

Type of Waste	Unit	6-Month Period	Est. Total Error (%)	Solid. Agent	Cont. Type	Form	No. Ship.
a. Spent resins, filter sludges, evaporator bottoms, etc	m ³ Ci	5.90E+00 4.57E+01	1.00E+00 2.29E+01	NA	HIC	DEWATERED FILTERS	2
b. Dry compressible waste, contaminated equip, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
c. Irradiated components, control rods, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
d. Other (describe)	m ³ Ci	NA	NA	NA	NA	NA	NA

HIC = High Integrity Container

V. SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
 REPORT TIME PERIOD JANUARY 1, 1996, THROUGH JUNE 30, 1996

A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

WASTE CLASS A

Type of Waste	Unit	6-Month Period	Est. Total Error (%)	Solid. Agent	Cont. Type	Form	No. Ship.
a. Spent resins, filter sludges, evaporator bottoms, etc	m ³ Ci	6.50E-01 9.51E+00	1.00E+00 2.29E+01	NA	Type A and HIC	Compacted	2
b. Dry compressible waste, contaminated equip, etc	m ³ Ci	3.46E+00 1.69E-02	1.00E+00 2.29E+01	NA	STP	Compacted / Incinerable	13
c. Irradiated components, control rods, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
d. Other (describe)	m ³ Ci	NA	NA	NA	NA	NA	NA

STP = Strong Tight Package
 HIC = High Integrity Container

V. SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
 REPORT TIME PERIOD JULY 1, 1996, THROUGH DECEMBER 31, 1996

A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

WASTE CLASS A

Type of Waste	Unit	6-Month Period	Est. Total Error (%)	Solid. Agent	Cont. Type	Form	No. Ship.
a. Spent resins, filter sludges, evaporator bottoms, etc	m ³ Ci	7.00E-01 8.05E+00	1.00E+00 2.29E+01	NA	HIC	Compacted	2
b. Dry compressible waste, contaminated equip, etc	m ³ Ci	1.81E+01 7.68E-01	1.00E+00 2.29E+01	NA	STP/ HIC	Compacted/ Incinerable	41
c. Irradiated components, control rods, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
d. Other (describe)	m ³ Ci	NA	NA	NA	NA	NA	NA

HIC = High Integrity Container
 STP = Strong Tight Package

V. SOLID WASTE AND IRRADIATED FUEL SHIPMENTS

REPORT TIME PERIOD JULY 1, 1996, THROUGH DECEMBER 31, 1996

B. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

WASTE CLASS B

Type of Waste	Unit	6-Month Period	Est. Total Error (%)	Solid. Agent	Cont. Type	Form	No. Ship.
a. Spent resins, filter sludges, evaporator bottoms, etc	m ³ Ci	3.85E+00 4.84E+01	1.00E+00 2.29E+01	NA	HIC	Dewatered Resin	1
b. Dry compressible waste, contaminated equip, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
c. Irradiated components, control rods, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
d. Other (describe)	m ³ Ci	NA	NA	NA	NA	NA	NA

HIC = High Integrity Container

V. SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
 REPORT TIME PERIOD JANUARY 1, 1997, THROUGH JUNE 30, 1997

A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

WASTE CLASS A

Type of Waste	Unit	6-Month Period	Est. Total Error (%)	Solid. Agent	Cont. Type	Form	No. Ship.
a. Spent resins, filter sludges, evaporator bottoms, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
b. Dry compressible waste, contaminated equip, etc	m ³ Ci	7.25E+00 1.62E-01	1.00E+00 2.29E+01	NA	STP	Compacted / Incinerable	23
c. Irradiated components, control rods, etc	m ³ Ci	NA	NA	NA	NA	NA	NA
d. Other (describe)	m ³ Ci	NA	NA	NA	NA	NA	NA

STP = Strong Tight Package

V. SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
 Report Time Period January 1, 1997, Through December 31, 1997

A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

Waste Class A

1. Type of Waste	Unit	Period Total	Est. Total Error (%)	Solid Agent	Cont. Type	Form	No. Ship.
a. Spent resins, filter sludges, evaporator bottoms, etc.	m ³ Ci	1.76E-01 3.76E-01	1.00E+00 2.29E+01	None	HIC	Dewatered resin	1
b. Dry compressible waste, contaminated equipment, etc.	m ³ Ci	9.55E+00 1.96E-01	1.00E+00 2.29E+01	None	STP	Compacted/ Incinerable	29
c. Irradiated components, control rods, etc.	m ³ Ci	NA	NA	NA	NA	NA	NA
d. Other (describe)	m ³ Ci	NA	NA	NA	NA	NA	NA

HIC = High Integrity Container
 STP = Strong Tight Package

V. SOLID WASTE AND IRRADIATED FUEL SHIPMENTS
 Report Time Period January 1, 1997, Through December 31, 1997

B. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (not irradiated fuel)

Waste Class C

1. Type of Waste	Unit	Period Total	Est. Total Error (%)	Solid Agent	Cont. Type	Form	No. Ship.
a. Spent resins, filter sludges, evaporator bottoms, etc.	m ³ Ci	5.92E+00 2.29E+01	1.00E+00 2.29E+01	None	HIC	Dewatered filters	2
b. Dry compressible waste, contaminated equipment, etc.	m ³ Ci	NA	NA	NA	NA	NA	NA
c. Irradiated components, control rods, etc.	m ³ Ci	NA	NA	NA	NA	NA	NA
d. Other (describe)	m ³ Ci	NA	NA	NA	NA	NA	NA

HIC = High Integrity Container