

ATTACHMENT 2

Proposed Changes to Appendix A

DPR-19

Revised pages

3/4.8-6  
3/4.8-36

DPR-25 Revised pages

3/4.8-6  
3/4.8-36

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3.8 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

4.8 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

from all uranium fuel sources is limited to less than or equal to 25 mrem to the total body or organ (except the thyroid, which is limited to less than or equal to 75 mrem) over 12 consecutive months. This Special Report shall include an analysis which demonstrates that radiation exposures to all members of the public from all uranium fuel cycle sources (including all effluent pathways and direct radiation) are less than the 40 CFR Part 190 Standard. Otherwise, obtain a variance from the Commission to permit releases which exceed the 40 CFR Part 190 Standard. The radiation exposure analysis contained in the Special Report shall use the methods prescribed in the ODCM. This report is in lieu of a Licensee Event Report.

- e. Used oil, contaminated by radioactivity, may be incinerated in Unit 1 Auxiliary Boilers provided releases do not exceed one-tenth of one percent (0.1%) of the limits of 3.8.A.3.a. or 3.8.A.3.b.

- e. The dose to a member of the public due to releases of all radionuclides in particulate form with half-lives greater than 8 days due to incineration of waste oil, will be determined based on isotopic analyses of each batch burned. Analyses will be performed prior to burning and appropriate records will be maintained.

### 3.8 LIMITING CONDITION FOR OPERATION BASES

#### A.1 Gaseous Effluents - Dose

This Specification is provided to ensure that the dose at the unrestricted area boundary from gaseous effluents from the units on site will be within the annual dose limits of 10 CFR Part 20 for unrestricted areas. The annual dose limits are the doses associated with the concentrations of 10 CFR Part 20, Appendix B, Table II. These limits provide reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of an individual in an unrestricted area to annual average concentrations exceeding the limits specified in Appendix B, Table II of 10 CFR Part 20 (10 CFR Part 20.106(b)). In the one case where effluent monitoring equipment is not used, i.e., the burning of contaminated oil in the heating boilers, administrative controls are imposed to limit concentration in the heating boiler stack to less than 10 CFR Part 20 Appendix B, Table II, Column 1 and the contribution to overall dose to less than 0.1 percent of the total station annual release. The specified release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to an individual at or beyond the unrestricted area boundary to less than or equal to 500 mrem/year to the total body or to not less than or equal to 3000 mrem/year to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to an infant via the cow-milk- infant pathway to not less than or equal to 1500 mrem/year for the nearest cow to the plant. For purposes of calculating doses resulting from airborne releases, the main chimney is considered to be an elevated release point and the reactor building vent stack is considered to be a mixed mode release point.

#### A.2 Dose, Noble Gases

This Specification is provided to implement the requirements of Sections II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Conditions For Operation implement the guides set forth in Section II.3 of Appendix I. The statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents will be kept "as low as is reasonably achievable." The Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I is to be shown by calculational procedures based on models and data such that the actual exposure of an individual through the appropriate pathways is unlikely to be substantially underestimated. The dose calculations established in the ODCM for calculating the doses due to the actual release rates of radioactive noble gases in gaseous effluents will be consistent with the methodology provided in Regulatory Guide

3.8 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

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## ATTACHMENT 3

### Evaluation of Significant Hazards Consideration

#### Description of Amendment Request

The Technical Specification requests approval to burn waste oil in onsite auxiliary boilers. The release limits will be controlled to insure that a maximum of 0.1% of Specification 3.8.A.3.a or b limits is allowed. Records of all analyses will be maintained to document all radioactive releases and associated offsite doses.

#### Basis for Proposed No Significant Hazards Consideration Determination

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870). The examples of actions involving no significant hazards consideration include: "(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications; for example, a more stringent surveillance requirement." The changes proposed in the application for amendment are encompassed by this example in that the proposed change would insert restrictions on the burning of waste oil into the Technical Specifications, thereby, defining additional limitations and controls where no such requirements currently exist.

Therefore, since the application for amendment involves a proposed change that is similar to an example for which no significant hazards consideration exists, Commonwealth Edison has made a proposed determination that the application involves no significant hazards consideration.