

ATTACHMENT 1 TO AEP:NRC:1039C
REASONS AND 10 CFR 50.92 ANALYSIS FOR
CHANGES TO THE
DONALD C. COOK NUCLEAR PLANT UNIT NO. 1 AND UNIT NO. 2
TECHNICAL SPECIFICATIONS

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DESCRIPTION OF CHANGE

Technical Specification (T/S) 6.12.2 presently requires that locked doors be provided to prevent unauthorized entry into high radiation areas in which the dose rate is greater than 1000 mrem/hr. These doors are to remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. Because we have some areas where it is not practicable to provide a locked door, on the NRC staff's advice we are requesting approval to implement the standard Technical Specifications provisions. Specifically, we are proposing to create a roped-off area that is conspicuously posted and has a flashing light warning device. This provision will only be used in areas where providing a locked door is not possible or not practicable due to area size or configuration.

This change was discussed with members of your staff and is consistent with the Westinghouse Standard Technical Specifications. Also, we have noted the concerns expressed in NRC Information Notice 88-79, "Misuse of Flashing Lights For High Radiation Area Controls." As stated above, we will only invoke this provision for areas where a locked door is not a viable solution to controlling access.

Per 10 CFR 50.92, a proposed amendment will not involve a significant hazards consideration if the proposed amendment does not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated,
- (2) create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated, or
- (3) involve a significant reduction in a margin of safety.

Criterion 1

Changing the access control requirements for high radiation areas does not impact any of the previously analyzed accidents. Therefore, we believe that this change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2

The proposed change does not involve a change in plant configuration or operation and will not place the plant in an unanalyzed condition; therefore, we believe the change will not create the possibility of a new or different kind of accident from any previously analyzed or evaluated.

Criterion 3

The Commission has provided guidance concerning the determination of significant hazards by providing certain examples (48 FR 14780) of amendments considered not likely to involve significant hazards considerations. We believe the proposed change is less likely than the sixth example in the above guidance to involve a significant hazards consideration. We believe that roping off the area and posting a flashing light will provide adequate protection against unauthorized entry into high radiation areas where providing locked doors is not possible or practicable. Therefore, we believe the proposed change will not result in an increase in the probability or consequences of a previously analyzed accident or reduce a margin of safety, and does not involve a significant hazards consideration as defined in 10 CFR 50.92.

ATTACHMENT 2 TO AEP:NRC:1039C

REVISED PAGES FOR THE

DONALD C. COOK NUCLEAR PLANT UNIT NO. 1 AND UNIT NO. 2

TECHNICAL SPECIFICATIONS

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 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. 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 aware of it.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be 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 Work Permit.

6.12.2 The requirements of 6.12.1 shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. When possible, locked doors shall be provided to prevent unauthorized entry into such areas, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist (Plant Radiation Protection Supervisor). Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

*Health Physics (Radiation Protection) personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

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