

L. Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital area under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

M. Post-Accident Sampling

A program shall be established, implemented and maintained which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1. Training of personnel,
2. Procedures for sampling and analysis,
3. Procedures for maintenance of sampling and analysis equipment.

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ATTACHMENT 2

DISCUSSION OF PROPOSED CHANGE

Background

NUREG - 0737 Item II.B.3, Post-Accident Sampling Capability, requires licensees to ensure that their facilities have the capability to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions. NUREG - 0737 Item II.F.1.2, Sampling and Analysis of Plant Effluents, requires licensees to have the capability to collect and analyze or measure representative samples of radioactive iodines and particulates in plant gaseous effluents during and following an accident.

Vepco has designed and installed a high range sampling system and effluent monitoring system at Surry Power Station which meets the requirements specified in Items II.B.3 and II.F.1.2 of NUREG-0737. Descriptions of these systems were submitted to NRC in Vepco's response to NUREG-0737 Post-TMI Requirements, dated December 10, 1980, as revised May 31, 1981, October 31, 1981 and May 31, 1982.

By letter dated November 1, 1983, NRC requested licensees to submit proposed Technical Specifications for certain NUREG-0737 items, including Item II.B.3, Post-Accident Sampling, and II.F.1.2, Sampling and Analysis of Plant Effluents.

Evaluation

In order for licensees to ensure that their plants have the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions, NRC requested that licensees establish administrative programs. The program should include: a) training of personnel, b) procedures for sampling and analysis, and c) provisions for maintenance of sampling and analysis equipment.

In its November 1, 1983 letter, NRC stated that it was acceptable for licensees to reference this program in the administrative controls section of the Technical Specifications, and include and maintain the detailed program descriptions in the plant operations manual. Vepco has elected to meet the requirement in this manner. Thus, Vepco proposes to add a new specification--6.4.M--to establish, implement and maintain a program for ensuring the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The proposed specification is consistent with the guidance provided in the NRC's November 1, 1983 letter.

Pursuant to 10CFR50.59, an evaluation to determine whether an unreviewed safety question exists has been made. The proposed change does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the

safety analysis report. Rather, the proposed change adds an administrative program to ensure the capability for measuring certain parameters in the accident and post-accident environment and does not increase the probability of an accident. In addition, the proposed change will aid in mitigating the consequences of an accident by providing timely information to operating personnel on certain plant parameters.

The proposed change does not create the possibility for an accident or malfunction of a different type than any previously evaluated in the SAR. The proposed change adds only an administrative requirement specifying certain aspects of a sampling program to be incorporated in the plant operations manual and does not result in the possibility of an accident of a different type than any previously evaluated.

The proposed change does not reduce the margin of safety as defined in the basis for any Technical Specification. Rather, the margin of safety is considered to be increased by ensuring that an adequate program for postaccident samplings is implemented and maintained in a controlled manner.

We have also determined whether the proposed change involves a significant hazards consideration. 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 proposed change is encompassed by this example in that the proposed change would add an additional requirement to establish, implement, and maintain a post-accident sampling system--including training of personnel, procedures for sampling and analysis, and provisions for maintenance of sampling and analysis equipment--and is thus similar to the example cited above.

Conclusions

Because the proposed change does not increase the probability of occurrence or the consequences of an accident or equipment malfunction, create the possibility of an accident not previously analyzed, nor reduce a safety margin, we conclude that no unreviewed safety question exists with respect to the proposed change.

Because the proposed change is similar to an example provided by the Commission for which no significant hazards consideration exists, we conclude that the proposed change involves no significant hazards consideration.

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