

RADIOACTIVE STORAGE

3/4.11.1 LIQUID STORAGE

BASES

3/4.11.1.4 LIQUID HOLDUP TANKS

The tanks listed in this Specification include all those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tanks' contents, the resulting concentrations would be less than the limits of 10 CFR Part 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.

Specifications 3/4.11.2.1 through 3/4.11.2.4 have been deleted.

ANNUAL RADIOLOGICAL EFFLUENT RELEASE REPORT*

6.9.1.9 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

- * A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

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 20.1601 of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr 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 knowledgeable of them.
- 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, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates. In addition, 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.

*Health Physics 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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Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tanks' contents, the resulting concentrations would be less than the limits of 10 CFR Part 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.

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ADMINISTRATIVE CONTROLS (Continued)

- g. Records of reactor tests and experiments.
- h. Records of training and qualification for current members of the plant staff.
- i. Records of in-service inspections performed pursuant to these Technical Specifications.
- j. Records of Quality Assurance activities required by the QA Manual.
- k. Records of the service life of all hydraulic and mechanical snubbers required to be operable by Technical Specification 3.7.10 including the date at which the service life commences and associated installation and maintenance records.
- l. Records of review performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- m. Records of meetings of the SNSOC.
- n. Records of meetings of the System Nuclear Safety and Operating Committee to issuance of Amendment No. 11.
- o. Records of secondary water sampling and water quality.
- p. Records for Environmental Qualification which are covered under the provisions of Paragraph 2.C(4) (3) of License No. NPF-7.
- q. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This would include procedures effective at specified times and QA records showing that these procedures were followed.
- r. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

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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 knowledgeable of them.
- c. An individual qualified in the 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, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates. In addition, 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.

*Health Physics personnel or personnel escorted by Health Physics 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 in high radiation areas.

Attachment 5
Significant Hazards Consideration

Significant Hazards Consideration

These supplemental changes do not change the conclusions of the significant hazards consideration that was submitted with the proposed Technical Specifications changes in our July 16, 1993 letter. A copy of the significant hazards consideration analysis from our July 16, 1993 letter is attached.

The significant hazards analysis in our July 16, 1993 letter remains valid. We have also reviewed the NRC's proposed finding of no significant hazards published in the August 18, 1993 Federal Register (58FR43937). These proposed supplemental Technical Specifications changes do not alter any of the facts or conclusions in the Federal Register notice.

Significant Hazards Consideration (July 16, 1993)

In accordance with 10 CFR 50.92, a proposed change to the Operating License (Technical Specifications) involves no significant hazards considerations if operation of the facility in accordance with the proposed change would not: (1) involve a significant increase in the probability or consequences of any accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. The proposed changes are administrative changes which are necessary due to regulatory changes and will not result in significant changes to the facility or its operation. The proposed change has been evaluated against each of the following criteria:

1. The proposed revisions to the liquid and gaseous release rate limits will not result in a change in the types or amounts of effluents released nor will there be an increase in individual or cumulative radiation exposures. In addition, these changes do not impact the operation or design of any plant structures, systems or components. These changes ensure compliance with 10 CFR 50.36a and 10 CFR 50, Appendix I and result in levels of radioactive materials in effluents being maintained As Low As Reasonably Achievable (ALARA).
2. The proposed changes do not affect the plant design or operation nor do they result in a change to the configuration of any equipment. There will be no change in types or increase in the amount of effluents released offsite. As a result, this proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.
3. Due to the operational flexibility provided by the limits given in this Technical Specification change request, the proposed amendments do not involve any actual change in the methodology used in the control of radioactive wastes or radiological environmental monitoring. Therefore these changes do not reduce the margin of safety.

Virginia Electric and Power Company concludes that the activities associated with these proposed Technical Specification changes satisfy the no significant hazards consideration criteria of 10 CFR 50.92 and, accordingly, a no significant hazards consideration finding is justified.