Southern California Edison Company Irvine Operations Center 23 Parker Ave. Irvine, CA. 92718

Attention: Mr. Jerry Trimble, Health Physics Engineer

SUBJECT: RESPONSE TO REQUEST FOR A COPY OF DRAFT 7, NUREG-0472, REVISION 3, STANDARD RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS FOR PRESSURIZED WATER REACTORS, SEPTEMBER 1982

Attached please find a copy of the subject document. This document is available through the NRC Public Document Room.

Gregory P. Yuha:, Chief Emergency Preparedness & Radiological Protection Branch 100

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bcc: L. Brown, NRR



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NUREC-0472 REVISION 3

STANDARD RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS FOR PRESSURIZED WATER REACTORS SEPTEMBER 1982

This draft document is intended for contractor quidence in reviewing RETS proposals for Operating Reactors .

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DEFINITIONS

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1.0 DEFINITIONS

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NOTE:

Add 3/4.3.3.10 and 3/4.3.3.11 with appropriate page numbers to Index section for Monitoring Instrumentation and its Bases; also add 5.1.3 to Section 5.0 Index and make appropriate additions to Section 6.0 Index.

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BASES

1.0 DEFINITIONS

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications.

ACTION

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1.1 ACTION shall be that part of a Specification which prescribes remedial measures required under designated conditions.

CHANNEL CALIBRATION

1.2 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRA-TION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

CHANNEL CHECK

1.3 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or statue with other indications and/or statue derived from independent instrumentation channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST

1.4 A CHANNEL FUNCTIL L TEST shall be:

- a. Analog channels the injection of a signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions.
- b. Bistable channels the injection of a signal into the sensor to verify OPERABILITY including alarm and/or trip functions.

DOSE EQUIVALENT 1-131

1.5 The DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcurie/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134 and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test Reactor Sites" [or in Table E-7 of NRC Regulatory Guide 1.109, Revision 1, October 1977].

1.0 DEFINITIONS (Continued)

GASEOUS RADWASTE TPLATMENT SYSTEM

1.6 A GASEOUS RADWASTE TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system offgases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

MEMBER(S) OF THE PUBLIC

1.7 MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the utility, its contractors or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational or other purposes not associated with the plant.

OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.8 The OFFSITE DOSE CALCULATION MANUAL shall contain the current methodology and parameters used in the calculation of offsite doses due to radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the environmental radiological monitoring program.

OPERABLE - OPERABILITY

1.9 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL MODE - MODE

1.10 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.1.

PROCESS CONTROL PROGRAM (PCP)

1.11 The PROCESS CONTROL PROGRAM shall contain the current formula, sampling, analyses, tests, and determinations to be made to ensure that the processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Part 20, 10 CFR Part 71 and Federal and State regulations and other requirements governing the disposal of the radioactive waste.

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1.0 DEFINITIONS (Continued)

PURGE - PURGING

1.12 PURGE or PURGING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

RATED THERMAL POWER

1.13 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of ______Mwt.

SITE BOUNDARY

1.14 The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.

SOLIDIFICATION

1.15 SOLIDIFICATION shall be the conversion of wet wastes into a form that meets shipping and burial ground requirements.

SOURCE CHECK

1.16 A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.

THERMAL POWER

1.17 THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

UNRESTRICTED AREA

1.18 An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

1.0 DEFINITIONS (Continued)

VENTILATION EXHAUST TREATMENT SYSTEM

1.19 A VENTILATION EXHAUST TREATMENT SYSTEM is any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment. Such a system is not considered to have any effect on noble gas effluents. Engineered Safety Feature (ESF) atmospheric cleanup systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

VENTING

1.20 VENTING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition. in such a manner that replacement air or gas is not provided or required during VENTING. Vent, used in system names, does not imply a VENTING process.

TABLE 1.1

OPERATIONAL MODES

MODE		REACTIVITY CONDITION, Keff	% RATED THERMAL POWER*	AVERAGE COOLANT
1.	POWER OPERATION	≥ 0.99	> 5%	> 350°F
2.	STARTUP	≥ 0.99	≤ 5%	≥ 350°F
3.	HOT STANDBY	< 0.99	0	> 350°F
4.	HOT SHUTDOWN	< 0.99	0	350°F > T > 200°F avg
5.	COLD SHUTDOWN	< 0.99	0	< 200°F
6.	REFUELING**	≤ 0.95	0	≤ 140°F

*Excluding decay heat.

**Fuel in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

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TABLE 1.2

FREQUENCY NOTATION

NOTATION	FREQUENCY
S	At least once per 12 hours.
0	At least once per 24 hours.
W	At least once per 7 days.
м	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 184 days.
R	At least once per 18 months.
\$/U	Prior to each reactor startup.
P	Completed prior to each release.
N.A.	Not applicable.

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3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a Specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the Action requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in:

- 1. At least HOT STANDBY within the next 6 hours,
- 2. At least HOT SHUTDOWN within the following 6 hours, and
- 3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

This Specification is not applicable in MODES 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through or to OPERATIONAL MCDES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual Specifications.

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APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:

- A maximum allowable extension not to exceed 25% of the surveillance interval, but
- b. The combined time interval for any 3 consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.10 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The alarm/ trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay suspend the release of radioactive liquid effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-12. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.10 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-12.

TABLE 3. 3-12

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	ACTIO
1.	GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE		
	a. Liquid Radwaste Effluent Line .	(1)	28
	b. Steam Generator Blowdown Effluent Line	(1)	29
2.	GROSS BETA OR GAMMA RADIOACTIVITY MONITORS PRUVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		
	a. Service Water System Effluent Line	(1)	30
	b. Component Cooling Water System Effluent Line	(1)	30
	c. Turbine Building (Floor Drains) Sumps Effluent Line	(1)	30
3.	CONTINUOUS COMPOSITE SAMPLERS AND SAMPLER FLOW MONITOR		
	a. Steam Generator Blowdown Effluent Line	(1)	29
	b. Turbine Building Sumps Effluent Line	(1)	30
4.	FLOW RATE MEASUREMENT DEVICES		
	a. Liquid Radwaste Effluent Line	(1)	31
	b. Steam Generator Blowdown Effluent Line	(1)	11
	c. Discharge Canal	(1)	11
	d. Turbine Building Sumps Effluent Line	(1)	31

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RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	ACTION
5.	RADIOACTIVITY RECORDERS*		merron
	a. Liquid Radwaste Effluent Line	(1)	33
	b. Steam Generator Blowdown Effluent Line	(1)	33
6.	TANK LEVEL INCICATING DEVICES**		
	a	_ (1)	32
	0.	_ (1)	32
	c	(1)	32
	d	. (1)	32

*Required only if alarm/trip set point is based on recorder-controller.

**Tanks included in this specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

TABLE NOTATION

ACTION 28 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases may continue provided that prior to initiating a release:

- At least two independent samples are analyzed in accordance with Specification 4.11.1.1, and
- At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge line valving;

Otherwise, suspend release of radioactive effluents via this pathway.

- ACTION 29 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided grab samples are analyzed for gross radioactivity (beta or gamma) at a lower limit of detection of at least 10-7 microcurie/ml:
 - a. At least once per 12 hours when the specific activity of the secondary coolant is greater than 0.01 microcurie/gram DOSE EQUIVALENT I-131.
 - b. At least once per 24 hours when the specific activity of the secondary coolant is less than or equal to 0.01 microcurie/gram DOSE EQUIVALENT I-131.
- ACTION 30 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided that, at least once per 12 hours, grab samples are collected and analyzed for gross radioactivity (beta or gamma) at a lower limit of detection of at least 10-7 microcurie/ml.
- ACTION 31 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours during actual releases. Pump performance curves generated in situ may be used to estimate flow.
- ACTION 32 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, liquid additions to this tank may continue provided the tank liquid level is estimated during all liquid additions to the tank.

TABLE NOTATION

ACTION 33 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via the affected pathway may continue provided the gross radioactivity level is determined at least once per 4 hours during actual releases.

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TABLE 4.3-12

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>IN:</u>	STRUMENT	CHANNEL CHECK	SOURCE	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
1.	GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE				
	a. Liquid Radwaste Effluent Line	D	Р	R(3)	Q(1)
	b. Steam Generator Blowdown Effluent Line	D	M	R(3)	Q(1)
2.	GROSS BETA OR GAMMMA RADIOACTIVITY MONITORS PROVIDING A SHA BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE				
	a. Service Water System Effluent Line	D	H	R(3)	Q(2)
	b. Component Cooling Water System Effluent Line	D		R(3)	Q(2)
	c. Turbine Building (Floor Drains) Sumps Effluent Line	D		R(3)	Q(1)
3.	CONTINUOUS COMPOSITE SAMPLERS AND SAMPLER FLOW MONITOR				
	a. Steam Generator Blowdown Effluent Line	D	N.A.	R	q
	b. Turbiae Building Sumps Effluent Line	D	N.A.	R	Q

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RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT		CHANNE!. CHECK	SOURCE	CHANNEL	CHANNEL FUNCTIONAL TEST
4.	FLOW RATE MEASUREMENT DEVICES				
	a. Liquid Radwaste Effluent Line	D(4)	N.A.	R	q
	b. Steam Generator Blowdown Effluent Line	D(4)	N.A.	R	Q
	c. Discharge Canal	D(4)	N.A.	R	0
	d. Turbine Building Sumps Effluent Line	D(4)	N.A.	R	Q
5.	RADIOACTIVITY RECORDERS*				
	a. Liquid Radwaste Effluent Line	D	N.A.	R	0
	b. Steam Generator Blowdown Effluent Line	D	N.A.	R	q
5.	TANK LEVEL INDICATING DEVICES*				
	a	D**	N.A.	R	0
	b	D**	N.A.	R	Q
	c	D**	N.A.	R	Q
	d	D**	N.A.	R	Q
*Se	e footnotes on page 3/4 3-73				

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**During liquid additions to the tank.

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TABLE NOTATION

- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm/trip setpoint.
 - 2. Circuit failure.
 - 3. Instrument indicates a downscale failure.
 - Instrument controls not set in operate mode.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm setpoint.
 - 2. Circuit failure.
 - 3. Instrument indicates a downscale failure.
 - Instrument controls not set in operate mode.
- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the intial calibration shall be used. (Operating plants may substitute previously established calibration procedures for this requirement.)
- (4) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

INSTRUMENTATION

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.11 The radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.3-13 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.2.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the ODCM.

APPLICABILITY: As shown in Table 3.3-13

ACTION:

- a. With a radioactive gaseous effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Specification, without delay suspend the release of radioactive gaseous effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-13. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.11 Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-13.

TABLE 3.3-13

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

		INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
1.	WAS	TE GAS HOLDUP SYSTEM			
	a.	Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release	(1)		16
	b.	Iodine Sampler	(1)		41
	c.	Particulate Sampler	(1)		41
	d.	Effluent System Flow Rate Measuring Device	(1)		36
	e.	Sampler Flow Rate Measuring Device	.(1)		36
2A.	WAST MONITED TO THE SECOND	TE GAS HOLDUP SYSTEM EXPLOSIVE GAS ITORING SYSTEM (for systems designed withstand the effects of a hydrogen losion)			
	a.	Hydrogen Monitor	(1)	**	39
	b.	Hydrogen or Oxygen Monitor	(1)	**	39
28.	WAST MONI desi a hy	TE GAS HOLDUP SYSTEM EXPLOSIVE GAS TORING SYSTEM (for systems not igned to withstand the effects of adrogen explosion)			
	a.	Hydrogen Monitor	(2)	**	40
	b.	Hydrogen or Oxygen Monitor	(2)	**	40

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RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

		INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
3.	CON	DENSER EVACUATION SYSTEM			
	a.	Noble Gas Activity Monitor	(1)		. 37
	b .	Iodine Sampler	(1)		41
	c.	Particulate Sampler	(1)		41
	d.	Flow Rate Monitor	(1)		36
	e.	Sampler Flow Rate Monitor	(1)	•	36
4.	VEN	T HEADER SYSTEM			
	a.	Noble Gas Activity Monitor	(1)	•	37
	b.	Iodine Sampler	(1)		41
	c.	Particulate Sampler	(1)		41
	d.	Flow Rate Monitor	(1)		36
	e.	Sampler Flow Rate Monitor	(1)		36
5.	CONT	AINMENT PURGE SYSTEM			
	a.	Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Relea	se (1)		38
	b.	lodine Sampler	(1)		41
	c.	Particulate Sampler	(1)		41

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RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

	INSTR	UMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
5.	CONTAINMEN	T PURGE SYSTEM (Continued)			
	d. Flow	Rate Monitor	(1)		36
	e. Sampl	er Flow Rate Monitor	(1)	•	36
6.	AUXILIARY SYSTEM	BUILGING VENTILATION			
	a. Noble	Gas Activity Monitor	(1)		37
	b. Iodin	e Sampler	(1)		41
	c. Parti	culate Sampler	(1)		41
	d. Flow	Rate Monitor	(1)		36
	e. Sample	er Flow Rate Monitor	(1)	•	36
7.	FUEL STORA	GE AREA VENTILATION SYSTEM			
	a. Noble	Gas Activity Monitor	(1)	*	37
	b. Iodine	e Sampler	(1)		41
	c. Partic	culate Sampler	(1)	•	41
	d. Flow f	Rate Monitor	(1)		36
	e. Sample	er Flow Rate Monitor	(1)		36

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RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

		INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
8.	RAL	DWASTE AREA VENTILATION SYSTEM			
	a.	Noble Gas Activity Monitor	(1)		37
	b.	Iodine Sampler	(1)		41
	c.	Particulate Sampler	(1)		41
	d.	Flow Rate Monitor	(1)		36
	e.	Sampler Flow Rate Monitor	(1)	•	36
9.	STE	AM GENERATOR BLOWDOWN VENT SYSTEM			
	a.	Noble Gas Activity Monitor	(1)		37
	b.	Iodine Sampler	(1)	· · · · · ·	41
	c.	Particulate Sampler	(1)	14. Le. 20. 1	41
	d.	Flow Rate Monitor	(1)		36
	e.	Sampler Flow Rate Monitor	(1)		36

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TABLE NOTATION

- * At all times.
- ** During waste gas holdup system operation (treatment for primary system offgases).
- ACTION 35 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the tank(s) may be released to the environment provided that prior to initiating the release:
 - At least two independent samples of the tank's contents are analyzed, and
 - At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge valve lineup;

Otherwise, suspend release of radioactive effluents via this pathway.

- ACTION 36 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this bathway may continue provided the flow rate is estimated at least once per 4 hours.
- ACTION 37 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided grab samples are taken at least once per 12 hours and these samples are analyzed for gross activity within 24 hours.
- ACTION 38 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, immediately suspend PURGING of radioactive effluents via this pathway.
- ACTION 39 With the number of channels OPEKABLE less than required by the Minimum Channels OPERABLE requirement, operation of this waste gas holdup system may continue provided grab samples are collected at least once per 24 hours and analyzed within the following 4 hours, and proper function of the recombiner is assured by monitoring recombiner temperature in accordance with approved procedures.
- ACTION 40 With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, operation of this system may continue for up to 14 days provided grab samples are taken and analyzed daily. With both channels inoperable operation may continue for up to 14 days provided grab samples are taken and analyzed (1) every 4 hours during degassing operations, and (2) daily during other operations.
- ACTION 41 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via the effected pathway may continue provided samples are continuously collected with auxiliary sampling equipment as required in Table 4.13-2.

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TABLE 4.3-13

RASTACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INS	TRUMENT	CHANNEL	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
1.	WASTE GAS HOLDUP SYSTEM					
	a. Noble Gas Accivity Monitor - Providing Alarm and Automatic			8(2)	0/1)	
	Terminación di kerease			R(3)	Q(I)	
	b. Iodine Sampier	W	N.A.	N.A.	N.A.	*
	c. Particulate Sampler	W	N.A.	N.A.	N.A.	\$
	d. Effluent System Flow Rate Measuring Device	Ρ	N.A.	R	Q	*
	e. Sampler Flow Rate Monitor	D	N.A.	R	Q	Ŕ
2A.	WASTE GAS HOLDUP SYSTEM EXPLOSIVE GAS MONITORING SYSTEM (for systems designed to withstand the effects of a hydrogen explosion)					
	a. Hydrogen Monitor	D	N.A.	Q(4)	M	\$ \$
	b. Hydrogen or Oxygen Monitor	D	N.A.	Q(4) or Q(5)	M	88
28.	WASTE GAS HOLDUP SYSTEM EXPLOSIVE GAS MONITORING SYSTEM (for systems not designed to withstand the effects of a hydrogen explosion)					
	a. Hydrogan Monitor	D	N.A.	Q(4)	M	安全
	b. Hydrogen or Oxygen Monitor	D	N.A.	Q(4) or Q(5)	M	ŔŔ

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RADIOACTIVE GASEDUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INS	TRUMENT	CHANNEL CHECK	SOURCE	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
3.	CONDENSER EVACUATION SYSTEM					
	a. Noble Gas Activity Monitor	D	M	R(3)	Q(2)	
	b. lodine Sampler	W	N.A.	N.A.	N.A.	
	c. Particulate Sampler	W	N. A.	N. A.	N.A.	
	d. Flow Rate Monitor	D	N. A.	R	Q	•
	e. Sampler Flow Rate Monitor	D	N.A.	R	Q	
4.	VENT HEADER SYSTEM					
	a. Noble Gas Activity Monitor	D	м	R(3)	Q(2)	
	b. Iodine Sampler	v	N.A.	N.A.	N. A.	•
	c. Particulate Sampler	W	N.A.	N.A.	N.A.	•
	d. Flow Rate Monitor	D	N.A.	R	Q	
	e. Sampler Flow Rate Monitor	D	N.A.	R	0	

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RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INS	TRUMENT	CHANNEL	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
5.	CONTAINMENT PURGE SYSTEM					
	a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release	D	P	R(3)	Q(1)	£
	b. Iodine Sampler	W	N.A.	N.A.	N.A.	A
	c. Particulate Sampler	W	N.A.	N.A.	N.A.	۵
	d. Flow Rate Monitor	D	N.A.	R	Q	Q
	e. Sampler Flow Rate Monitor	D	N.A.	R	Q	۵
6.	AUXILIARY BUILDING VENTILATION SYSTEM					
	a. Noble Gas Actvity Monitor	D	M	R(3)	Q(2)	£
	b. Iodine Sampler	W	N.A.	N.A.	N.A.	\$
	c. Particulate Sampler	W	N.A.	N.A.	N.A.	£
	d. Flow Rate Monitor	D	N.A.	R	Q	*
	e. Sampler Flow Rate Monitor	D	N.A.	R	Q	*

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RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INS	TRUMENT	CHANNEL	SOURCE	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
7.	FUEL STORAGE AREA VENTILATION SYSTEM	•				
	a. Noble Gas Activity Monitor	D	M	R(3)	Q(2)	•
	b. Iodine Sampler	W	N.A.	N.A.	N.A.	
	c. Particulate Sampler	W	N.A.	N.A.	N.A.	
	d. Flow Rate Monitor	D	N.A.	R	Q	
	e. Sampler Flow Rate Monitor	D	N.A.	R	Q	•
8.	RADWASTE AREA VENTILATION SYSTEM					
	a. Noble Gas Activity Monitor	D	M	R(3)	Q(2)	
	b. Iodine Sampler	v	N.A.	N.A.	N.A	
	c. Particulate Sampler	v	N.A.	N.A.	N.A	
	d. Flow Rate Monitor	D	N.A.	R	Q	
	e. Sampler Flow Rate Monitor	D	N.A.	R	Q	

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RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT		CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
9.	STEAM GENERATOR BLOWDOWN VENT SYSTEM	•				
	a. Noble Gas Activity Monitor	D	M	R(3)	Q(2)	
	b. Iodine Sampler	W	N.A.	N.A.	N.A	•
	c. Particu'ate Sampler	W	N.A.	N.A.	N.A.	
	d. Flow Rate Monitor	D	N.A.	R	Q	•
	e. Sampler Flow Rate Monitor	D	N.A.	R	Q	

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TABLE NOTATION

- * At all times other than when the line is valved out and locked.
- During waste gas holdup system operation (treatment for primary system offgases).
- The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occurs if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm/trip setpoint.
 - 2. Circuit failure.
 - Instrument indicates a downscale failure.
 - 4. Instrument controls not set in operate mode.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
 - 1. Instrument indicates measured levels above the alarm setpoint.
 - 2. Circuit failure.
 - 3. Instrument indicates a downscale failure.
 - 4. Instrument controls not set in operate mode.
- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used. (Operating plants may substitute previously established calibration procedures for this requirement.)
- (4) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:
 - 1. One volume percent hydrogen, balance nitrogen, and
 - 2. Four volume percent hydrogen, balance nitrogen.
- (5) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:
 - 1. One volume percent oxygen, balance nitrogen, and
 - 2. Four volume percent oxygen, balance nitrogen.

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3/4.11 RADIOACTIVE EFFLUENTS

3/4.11.1 LIQUID EFFLUENTS

CONCENTRATION

LIMITING CONDITION FOR OPERATION

3.11.1.1 The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (see Figure 5.1-3) shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2×10^{-4} microcuries/ml total activity.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS exceeding the above limits, without delay restore the concentration to within the above limits.
- b. The provisions of Specification 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.1.1 Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-1.

4.11.1.1.2 The results of the radioactivity analyses shall be used in accordance with the methodology and parameters in the ODCM to assure that the concentrations at the point of release are maintained within the limits of Specification 3.11.1.1.

TABLE 4.11-1

Liquid Relsase Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) ^a (µCi/ml)	
A. Batch Waste Release Tanks	P Each Batch	P Each Batch	Principal Gamma Emitters	5×10 ⁻⁷	
			1-131	1x10-6	
	P One Batch/M	M	Dissolved and Entrained Gases (Gamma Emitters)	1×10-5	
	P Each Patch	M	H-3	1x10 ⁻⁵	
	Each Batch	Composite"	Gross Alpha	1×10 ⁻⁷	
	P Each Batch	Q Composite ^d	Sr-89, Sr-90	5x10 ⁻⁸	
			Fe=55	1x10 ⁻⁶	
B. Continuous Releases	Continuous	W Composite ^f	Principal Gamma Emitters	5×10 ⁻⁷	
		I-131	1-131	1x10 ⁻⁶	
	M Grab Sample		Dissolved and Entrained Gases (Gamma Emitters)	1×10 ⁻⁵	
	Cantinumf	M. f	H-3	1x10 ⁻⁵	
	continuous	composite"	Gross Alpna	1×10 ⁻⁷	
	Continuef	9. f	Sr-89, Sr-90	5x10 ⁻⁸	
	concinuous	composite'	Fe-55	1×10 ⁻⁶	

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

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TABLE NOTATION

^aThe LLD is defined, for purposes of these specifications, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system, which may include radiochemical separation:

 $LLD = \frac{4.66 \text{ s}_{b}}{E \cdot V \cdot 2.22 \times 10^{6} \cdot Y \cdot \exp(-\lambda\Delta t)}$

Where:

LLD is the "a priori" lower limit of detection as defined above, as microcuries per unit mass or volume.

s, is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,

E is the counting efficiency, as counts per disintegration,

V is the sample size in units of mass or volume,

 2.22×10^6 is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield, when applicable,

 $\boldsymbol{\lambda}$ is the radioactive decay constant for the particular radionuclide, and

 Δt for plant effluents is the elapsed time between the midpoint of sample collection and time of counting.

Typical values of E, V, Y, and Δt should be used in the calculation.

It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an <u>a posteriori</u> (after the fact) limit for a particular measurement.

^bA batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses, each batch shall be isolated, and then thoroughly mixed to assure representative sampling.

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TABLE NOTATION

^CThe principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.12.

^dA composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen that is representative of the liquids released.

^eA continuous release is the discharge of liquid wastes of a nondiscrete volume, e.g., from a volume of a system that has an input flow during the continuous release.

^fTo be representative of the quantities and concentrations of radioactive materials in liquid effluents, samples shall be collected continuously in proportion to the rate of flow of the effluent stream. Prior to analyses, all samples taken for the composite shall be thoroughly mixed in order for the composite sample to be representative of the effluent release.
DOSE

LIMITING CONDITION FOR OPERATION

3.11.1.2 The dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each reactor unit, to UNRESTRICTED AREAS (see Figure 5.1-3) shall be limited:

- a. During any calendar quarter to less than or equal to 1.5 mrems to the total body and to less than or equal to 5 mrems to any organ, and
- b. During any calendar year to less than or equal to 3 mrems to the total body and to less than or equal to 10 mrems to any organ.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits. This Special Report shall also include (1) the results of radiological analyses of the drinking water source and (2) the radiological impact on finished drinking water supplies with regard to the requirements of 40 CFR Part 141.*
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11 ..2 Cumulative dose contributions from liquid effluents for the current calendar quarter and the current calendar year shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

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^{*}Applicable only if drinking water supply is taken from the receiving water body within 3 miles of the plant discharge. In the case of river sited plants this is 3 miles downstream only.

LIQUID RADWASTE TREATMENT SYSTEM

LIMITING CONDITION FOR OPERATION

3.11.1.3 The liquid radwaste treatment system shall be used to reduce the radioactive materials in liquid wastes prior to their discharge when the projected doses due to the liquid effluent, from each reactor unit, to UNRESTRICTED AREAS (see Figure 5.1-3) would exceed 0.06 mrem to the total body or 0.2 mrem to any organ in a 31 day period.

APPLICABILITY: At all times.

ACTION:

- a. With radioactive liquid waste being discharged without treatment and in excess of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report that includes the following information:
 - Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 - Action(s) taken to restore the 'cooperable equipment to OPERABLE status, and
 - Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.3 Doses due to liquid releases from each reactor unit to UNRESTRICTED AREAS shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM.

LIQUID HOLDUP TANKS* (Appropriate alternatives to the ACTIONS and SURVEILLANCE REQUIREMENTS below can be accepted if they provide reasonable 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 II, Column 2, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.)

LIMITING CONDITION FOR OPERATION

3.11.1.4 The quantity of radicactive materi. Contained in each of the following unprotected outdoor tanks shall be limited to less than or equal to ______ curies, excluding tritium and dissolved or entrained noble gases.

- a._____
- c. _____

d. Outside temporary tank

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank, within 48 hours reduce the tank contents to within the limit, and describe the events leading to this condition in the next Semiannual Radioactive Effluent Release Report.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.4 The quantity of radioactive material contained in each of the above listed tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per 7 days when radioactive materials are being added to the tank.

Tanks included in this specification are 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.

3/4.11.2 GASEOUS EFFLUENTS

DOSE RATE

LIMITING CONDITION FOR OPERATION

3.11.2.1 The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-3) shall be limited to the following:

- a. For noble gases: Less than or equal to 500 mrems/yr to the total body and less than or equal to 3000 mrems/yr to the skin, and
- b. For iodine-131, for tritium, and for all radionuclides in particulate form with half lives greater than 8 days: Less than or equal to 1500 mrems/yr to any organ.

APPLICABILITY: At all times.

ACTION:

- a. With the dose rate(s) exceeding the above limits, without delay restore the release rate to within the above limit(s).
- b. The provisions of Specification 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.1.1 The dose rate due to noble gases in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM.

4.11.2.1.2 The dose rate due to iodine-131, tritium, and all radionuclides in particulate form with half lives greater than 8 days in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 4 11-2.

TABLE 4.11-2

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

Gaseous Release Type		Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) ^a (µCi/ml)	
Α.	Waste Gas Storage Tank	Each Tank Grab Sample	Each Tank	Principal Gamma Emitters ^b	1×10 ⁻⁴	
8.	Containment PURGE	P Each PURGE ^C Grab Sample	P Each PURGE ^C	Principal Gamma Emitters ^b	1x10-4 T.	
-				H-3	1+10-6	
C.	(List other release points where gas- eous effluents are discharged from the facility)	M ^{c,d,e} Grab Sample	Mc	Principal Gamma Emitters ^b	1x10-4	
				h-3	1×10 ⁻⁶	
D.	All Release Types as listed in A, B, C above.	Continuous ^f	W ^g Charcoal Sample	I-131	1×10 ⁻¹²	
		Continuous ^f	W ^g Particulate Sample	Principal Gamma Emitters ^b (I-131, Others)	1×10 ⁻¹¹	
		Continuous ^f	M Composite Particulate Sample	Gross Alpha	1×10 ⁻¹¹	
		Continuous ^f	Q Composite Particulate Sample	Sr-89, Sr-90	1×10 ⁻¹¹	
		Continuous ^f	Noble Gas Monitor	Noble Gases Gross Beta or Gamma	1×10 ⁻⁶	

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TABLE 4.11-2 (Continued)

TABLE NOTATION

The LLD is defined, for purposes of these specifications, as the smallest concentration of radioactive material in a sample that will yield a net count. above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system, which may include radiochemical separation:

 $LLD = \frac{4.66 \text{ s}_{b}}{\text{E} \cdot \text{V} \cdot 2.22 \times 10^{6} \cdot \text{Y} \cdot \exp(-\lambda\Delta t)}$

Where:

LLD is the "a priori" lower limit of detection as defined above, as microcuries per unit mass or volume,

s, is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,

E is the counting efficiency, as counts per disintegration,

V is the sample size in units of mass or volume,

 2.22×10^6 is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield, when applicable,

 $\boldsymbol{\lambda}$ is the radioactive decay constant for the particular radionuclide, and

At for plant effluents is the elapsed time between the midpoint of sample collection and time of counting.

Typical values of E, V, Y, and Δt should be used in the calculation.

It should be recognized that the LLD is defined as an <u>a priori</u> (before the fact) limit representing the capability of a measurement system and not as an <u>a posteriori</u> (after the fact) limit for a particular measurement.

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TABLE 4.11-2 (Continued)

TABLE NOTATION

^bThe principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 for gaseous emissions and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141 and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.12.

^CSampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER change exceeding 15 percent of RATED THERMAL POWER within one hour unless (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 3; and (2) the noble gas activity monitor shows that effluent activity has not increased by more than a factor or 3.

dTritium grab samples shall be taken at least once per 24 hours when the refueling canal is flooded.

^eTritium grab samples shall be taken at least once per 7 days from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.

^fThe ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Specifications 3.11.2.1, 3.11.2.2 and 3.11.2.3.

⁹Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing, or after removal from sampler. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or THERMAL POWER change exceeding 15 percent of RATED THERMAL POWER in one hour and analyses shall ba completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement does not apply if (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 3; and (2) the noble gas monitor shows that effluent activity has not increased more than a factor of 3.

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DUSE - NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.2 The air dose due to noble gases released in gaseous effluents, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 5.1-3) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 5 mrads for gamma radiation and less than or equal to 10 mrads for beta radiation and,
- b. During any calendar year: Less than or equal to 10 mrads for gamma radiation and less than or equal to 20 mrads for beta radiation.

APPLICABILITY: At all times.

ACTION

- a. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, in lieu of a Licensee Event Report, pepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.2 Cumulative dose contributions for the current calendar quarter and current calendar year for noble gases shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

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DOSE - IODINE-131, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to a MEMBER OF THE PUBLIC from iodine-131, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 5.1-3) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 7.5 mrems to any organ and,
- b. During any calendar year: Less than or equal to 15 mrems to any organ.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of iodine-131, tritium, and radionuclides in particulate form with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.3 Cumulative dose contributions for the current calendar quarter and current calendar year for iodine-131, tritium, and radionuclides in particulate form with half lives greater than 8 days shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

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GASEOUS RADWASTE TREATMENT SYSTEM

LIMITING CONDITION FOR OPERATION

3.11.2.4 The GASEOUS RADWASTE TREATMENT SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 5.1-3) would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation in a 31 day period. The VENTILATION EXHAUST TION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 5.1-3) would exceed to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 5.1-3) would exceed 0.3 mrem to any organ in a 31 day period.

APPLICABILITY: At all times.

ACTION:

- a. With gaseous waste being discharged without treatment and in excess of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that includes the following information:
 - Explanation of why gaseous radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability.
 - Action(s) taken to restore the inoperable equipment to OPERABLE status, and
 - 3. Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.4.1 Doses due to gaseous releases from each reactor unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM.

EXPLOSIVE GAS MIXTURE (Systems designed to withstand a hydrogen explosion)

LIMITING CONDITION FOR OPERATION

3.11.2.5 The concentration of hydrogen or oxygen in the waste gas holdup system shall be limited to less than or equal to 4% by volume.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of hydrogen or oxygen in the waste gas holdup system exceeding the limit, restore the concentration to within the limit within 48 hours.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.17.2.5 The concentration of hydrogen or oxygen in the waste gas holdup system shall be determined to be within the above limits by continuously monitoring the waste gases in the waste gas holdup system with the hydrogen or oxygen monitors required OPERABLE by Table 3.3-13 of Specification 3.3.3.11.

EXPLOSIVE GAS MIXTURE (Systems not designed to withstand a hydrogen explosion)

LIMITING CONDITION FOR OPERATION

3.11.2.5A The concentration of hydrogen and/or oxygen in the waste gas holdup system shall be limited to less than or equal to 2% by volume.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of hydrogen and/or oxygen in the waste gas holdup systam greater than 2% by volume but less than or equal to 4% by volume, restore the concentration of hydrogen and/or oxygen to within the limit within 48 hours.
- b. With the concentration of hydrogen and/or oxygen in the waste gas holdup system greater than 4% by volume, immediately suspend all additions of waste gases to the system and reduce the concentration of hydrogen and/or oxygen to less than or equal to 2% by volume without delay.
- c. The provisions of Specification: 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.5A The concentrations of hydrogen and/or oxygen in the waste gas holdup system shall be determined to be within the above limits by continuously monitoring the waste gases in the waste gas holdup system with the hydrogen and/or oxygen monitors required OPERABLE by Table 3.3-13 of Specification 3.3.3.11.

EXPLOSIVE GAS MIXTURE (Hydrogen rich systems not designed to withstand a hydrogen explosion)

LIMITING CONDITION FOR OPERATION

3.11.2.58 The concentration of oxygen in the waste gas holdup system shall be limited to less than or equal to 2% by volume whenever the hydrogen concentration exceeds 4% by volume.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of oxygen in the waste gas holdup system greater than 2% by volume but less than or equal to 4% by volume, reduce the oxygen concentration to the above limits within 48 hours.
- b. With the concentration of oxygen in the waste gas holdup system greater than 4% by volume and the hydrogen concentration greater than 2% by volume, immediately suspend all additions of waste gases to the system and reduce the concentration of oxygen to less than or equal to 2% by volume without delay.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.58 The concentrations of hydrogen and oxygen in the waste gas holdup system shall be determined to be within the above limits by continuously monitoring the waste gases in the waste gas holdup system with the hydrogen and oxygen monitors required OPERABLE by Table 3.3-13 of Specification 3.3.3.11.



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IMAGE EVALUATION TEST TARGET (MT-3)



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GAS STORAGE TANKS

LIMITING CONDITION FOR OPERATION

3.11.2.6 The quantity of radioactivity contained in each gas storage tank shall be limited to less than or equal to _____ curies noble gases (considered as Ke-133).

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any gas storage tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.6 The quantity of radioactive material contained in each gas storage tank shall be determined to be within the above limit at least once per 24 hours when radioactive materials are being added to the tank.

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3/4.11.3 SOLID RADIOACTIVE WASTE

LIMITING CONDITION FOR OPERATION

3.11.3 The solid radwaste system shall be used in accordance with a PROCESS CONTROL PROGRAM to process wet radioactive wastes to meet shipping and burial ground requirements.

APPLICABILITY: At all times.

ACTION:

- a. With the provisions of the PROCESS CONTROL PROGRAM not satisfied, suspend shipments of defectively processed or defectively packaged solid radioactive wastes from the site.
- b. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.9.b are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.3 THE PROCESS CONTROL PROGRAM shall be used to verify the SOLIDIFICATION of at least one representative test specimen from at least every tenth batch of each type of wet radioactive waste (e.g., filter sludges, spent resins, evaporator bottoms, boric acid solutions, and sodium sulfate solutions).

- a. If any test specimen fails to verify SOLIDIFICATION, the SOLIDIFICATION of the batch under test shall be suspended until such time as additional test specimens can be obtained, alternative SOLIDIFICATION parameters can be determined in accordance with the PROCESS CONTROL PROGRAM, and a subsequent test verifies SOLIDIFICATION. SOLIDIFI-CATION of the batch may then be resumed using the alternative SOLIDIFICATION parameters determined by the PROCESS CONTROL PROGRAM.
- b. If the initial test specimen from a batch of waste fails to verify SOLIDIFICATION, the PROCESS CONTROL PROGRAM shall provide for the collection and testing of representative test specimens from each consecutive batch of the same type of wet waste until at least 3 consecutive initial test specimens demonstrate SOLIDIFICATION. The PROCESS CONTROL PROGRAM shall be modified as required, as provided in Specification 6.13, to assure SOLIDIFICATION of subsequent batches of waste.

3/4.11.4 TOTAL DOSE

LIMITING CONDITION FOR OPERATION

3.11.4 The annual (calendar year) dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radicactivity and to radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mrems to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems.

APPLICABILITY: At all times.

ACTICN:

- With the calculated doses from the release of radioactive materials a. in liquid or gaseous effluents exceeding twice the limits of Specification 3.11.1.2.a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a, or 3.11.2.3.b, calculations should be made including direct radiation contributions from the reactor units and from outside storage tanks to determine whether the above limits of Specification 3.11.4 have been exceeded. If such is the case in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in 10 CFR Part 20.405c, shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the release condition resulting in violation of 40 CFR Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.4.1 Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Specifications 4.11.1.2, 4.11.2.2, and 4.11.2.3, and in accordance with the methodology and parameters in the ODCM.

4.11.4.2 Cumulative dose contributions from direct radiation from the reactor units and from radwaste storage tanks shall be determined in accordance with the methodology and parameters in the ODCM. This requirement is applicable only under conditions set forth in Specification 3.11.4.a.

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3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.1 MONITORING PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.1 The radiological environmental monitoring program shall be conducted as specified in Table 3.12-1.

APPLICABILITY: At all times.

ACTION:

- a. With the radiological environmental monitoring program not being conducted as specified in Table 3.12-1, in lieu of a Licensee Event Report, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Specification 6.9.1.11, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.
- b. With the level of radioactivity as the result of plant effluents in an environmental sampling medium at a specified location exceeding the reporting levels of Table 3.12-2 when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose* to A MEMBER OF THE PUBLIC is less than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2, and 3.11.2.3. When more than one of the radionuclides in Table 3.12-2 are detected in the sampling medium, this report shall be submitted if:

 $\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + \dots \ge 1.0$

When radionuclides other than those in Table 3.12-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose* to A MEMBER OF THE PUBLIC is equal to or greater than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2 and 3.11.2.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report.

c. With milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 3.12-1, identify locations for obtaining replacement samples and add them to the radiological environmental monitoring program within 30 days. The specific

^{*}The methodology and parameters used to estimate the potential annual dose to a MEMBER OF THE PUBLIC shall be indicated in this report.

RADIOLOGICAL ENVIRONMENTAL MONITORING

locations from which samples were unavailable may then be deleted from the monitoring program. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.12, identify the cause of the unavailability of samples and identify the new location(s) for obtaining replacement samples in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

d. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.1 The radiological environmental monitoring samples shall be collected pursuant to Table 3.12-1 from the specific locations given in the table and figure(s) in the ODCM, and shall be analyzed pursuant to the requirements of Table 3.12-1 and the detection capabilities required by Table 4.12-1.

TABLE 3.12-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM*

Exposure Pathway and/or Sample

1. DIRECT RADIATIOND

Number of Representative Samples and Sample Locations^a

40 routine monitoring stations (DR1-DR40) either with two or more dosimeters or with one instrument for measuring and recording dose rate continuously, placed as follows:

an inner ring of stations, one in each meteorological sector in the general area of the SITE BOUNDARY (DR1-DR16);

an outer ring of stations, one in each meteorological sector in the 6- to 8-km range from the site (DR17-DR32);

the balance of the stations (DR33-DR40) to be placed in special interest areas such as population centers, nearby residences, schools, and in 1 or 2 areas to serve as control stations. Sampling and Collection Frequency

Quarterly

Type and Frequency of Analysis

Gamma dose quarterly.

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*The number, media, frequency, and location of samples may vary from site to site. This table presents an acceptable mininum program for a site at which each entry is applicable. Local site characteristics must be examined to determine if pathways not covered by this table may significantly contribute to an individual's dose and should be included in the sampling program. The code letters in parentheses, e.g. DR1, A1, provide one way of defining generic sample locations in this specification that can be used to identify the specific locations in the map(s) and table in the ODCM.

DRAS

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway ar.1/or Sample Number of Representative Samples and Sample Locations^a

Sampling and Collection Frequency

Type and Frequency of Analysis

2. AIRBORNE

Radioiodine and Particulates

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3. WATERBORNE

- a. Surface[†]
- b. Ground

c. Drinking

Samples from 5 locations (A1-A5):

3 samples (A1-A3) from close to the 3 SITE BOUNDARY locations, in different sectors, of the highest calculated annual average groundlevel D/O.

1 sample (A4) from the vicinity of a community having the highest calculated annual average groundlevel D/Q.

1 sample (A5) from a control location, as for example 15-30 km distant and in the least prevalent wind direction.

1 sample upstream (Wal) 1 sample downstream (Wa2)

Samples from 1 or 2 sources (Wb1, Wb2), only if likely to be affected.

1 sample of each of 1 to 3 (Wc1 -Wc3) of the nearest water supplies that could be affected by its discharge.

1 sample from a control location (Wc4).

Continuous sampler operation with sample collection weekly, or more frequently if required by dust loading. Radioiodine Cannister: I-131 analysis weekly.

Particulate Sampler: Gross beta radioactivity analysis following filter change; Gamma isotopic analysis^e of composite (by location) guarterly.

Composite sample over 1-month period⁹

Quarterly

Composite sample over 2-week period⁹ when I-131 analysis is performed, monthly composite otherwise Gamma isotopic analysis^e monthly. Composite for tritium analysis quarterly.

Gamma isotopic^e and tritium analysis quarterly.

I-131 analysis on each composite when the dose calculated for the consumption of the water is greater than 1 mrem per year. Composite for gross beta and gamma isotopic analyses monthly. Composite for tritium analysis guarterly.

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Number of Representative Sampling and Type and Frequency **Exposure** Pathway Samples and Sample Locations^a **Collection Frequency** of Analysis and/or Sample Gamma isotopic analysis Semiannually d. Sediment 1 sample from downstream area semiannually. with existing or potential from shoreline recreational value (Wd1). INGESTION 4 Gamma isotopic^e and I-131 a. Milk Samples from milking animals Semimonthly when analysis semimonthly when in 3 locations (la1 - la3) within animals are on animals are on pasture; 5 km distance having the highest pasture, monthly at dose potential. If there are other times monthly at other times. none, then, 1 sample from milking animals in each of 3 areas (Ia1 -1a3) between 5 to 8 km distant where doses are calculated to be greater than 1 mrem per yr'. 1 sample from milking animals at a control location (Ia4). 15-30 km distant and in the least prevalent wind direction. Gamma isotopic analysis 1 sample of each commercially Sample in season, or b. Fish and on edible portions. and recreationally important semiannually if they Inverteare not seasonal species in vicinity of plant brates discharge area. (Ib1 - Ib). 1 sample of same species in areas not influenced by plant discharge (Ib10 - Ib). Gamma isotopic analyses^e At time of harvest^J 1 sample of each principal class c. Food on edible portion. of food products from any area Products that is irrigated by water in which liquid plant wastes have

been discharged (Icl - Ic).

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample

> c. Food Products (cont'd)

Number of Representative Samples and Sample Locations^a

Samples of 3 different kinds of broad leaf vegetation grown nearest each of two different offsite locations of highest predicted annual average groundlevel D/Q if milk sampling is not performed (Ic10 - Ic13).

1 sample of each of the similar broad leaf vegetation grown 15-30 km distant in the least prevalent wind direction if milk sampling is not performed (Ic20 - Ic23). Sampling and Collection Frequency

Monthly when available

Monthly when available

Type and Frequency of Analysis

Gamma isotopic^e and I-131 analysis.

Gamma isotopic^e and I-131 analysis.

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TABLE NOTATION

^dAirborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than ten times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.

Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.

^fThe "upstream sample" shall be taken at a distance beyond significant influence of the discharge. The "downstream" sample shall be taken in an area beyond but near the mixing zone. "Upstream" samples in an estuary must be taken far enough upstream to be beyond the plant influence. Salt water shall be sampled only when the receiving water is utilized for recreational activities.

^gA composite sample is one in which the quantity (aliquot) of liquid sampled is proportional to the quantity of flowing liquid and in which the method of sampling employed results in a specimen that is representative of the liquid flow. In this program composite sample aliquots shall be collected at time intervals that are very short (e.g., hourly) relative to the compositing period (e.g., monthly) in order to assure obtaining a representative sample.

^hGroundwater samples shall be taken when this source is tapped for drinking or irrigation purposes in areas where the hydraulic gradient or recharge properties are suitable for contamination.

¹The dose shall be calculated for the maximum organ and age group, using the methodology and parameters in the ODCM.

^jIf harvest occurs more than once a year, sampling shall be performed during each discrete harvest. If harvest occurs continuously, sampling shall be monthly. Attention shall be paid to including samples of tuborous and root food products.

REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES

		Repor	Reporting Levels					
Analysis	Water (pCi/l)	Airborne Particulate or Gases (pCi/m ³)	Fish (pCi/kg, wet)	Milk (pCi/2)	Food Products (pCi/kg, wet)			
H-3	20,000*							
Mn-54	1,000		30,000					
Fe-59	400		10,000					
Co-58	1,000		30,000	V PARAS				
Co-60	300		10,000					
Zn-65	300		20,000					
Zr-Nb-95	400							
I-131	2	0.9		3	100			
Cs-134	30	10	1,000	60	1,000			
Cs-137	50	20	2,000	70	2,000			
Ba-La-140	200			300				

*For drinking water samples. This is 40 CFR Part 141 value. If no drinking water pathway exists, a value of 30,000 pCi/2 may be used.

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TABLE 4.12-1

DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS^a

Analysis	Water (pCi/£)	Airborne Particulate or Gas (pCi/m ³)	Fish (pCi/kg,wet)	Milk (pCi/g)	Food Products (pCi/kg,wet)	Sediment (pCi/kg,dry)
gross beta	4	0.01				
H-3	2000*					
Mn-54	15		130			
Fe-59	30		260			
Co-58,60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
1-131	ıď	0.07		1	60	
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	ð0	180
3a-La-140	15			15		

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LOWER LIMIT OF DETECTION (LLD)^{b,c}

*If no drinking water pathway exists, a value of 3000 pCi/l may be used.

TABLE NOTATION

^aThis list does not mean that only these nuclides are to be considered. Other peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

^bRequired detection capabilities for thermoluminescent dosimeters used for environmental measurements are given in Regulatory Guide 4.13.

^CThe LLD is defined, for purposes of these specifications, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

for a particular measurement system, which may include radiochemical separation:

$$LLD = \frac{4.66 s_b}{E \cdot V \cdot 2.22 \cdot Y \cdot exp(-\lambda\Delta t)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above, as picocuries per unit mass or volume,

s, is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,

E is the counting efficiency, as counts per disintegration,

V is the sample size in units of mass or volume,

2.22 is the number of disintegrations per minute per picocurie,

Y is the fractional radiochemical yield, when applicable,

 $\boldsymbol{\lambda}$ is the radioactive decay constant for the particular radionuclide, and

 Δt for environmental samples is the elapsed time between sample collection, or end of the sample collection period, and time of counting

Typical values of E, V, Y, and At should be used in the calculation.

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TABLE NOTATION

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement. Analyses shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally background fluctuations, unavoidable small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances may render these LLDs unachievable. In such cases, the contributing factors shall be identified and described in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

dLLD for drinking water samples. If no drinking water pathway exists, the LLD of gamma isotopic analysis may be used.

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.2 LAND USE CENSUS

LIMITING CONDITION FOR OPERATION

3 12.2 A land use census shall be conducted and shall identify within a distance of 8 km (5 miles) the location in each of the 16 meteorological sectors of the nearest milk animal, the nearest residence and the nearest garden* of greater than 50 m² (500 ft²) producing broad leaf vegetation. (For elevated releases as defined in Regulatory Guide 1.111, Revision 1, July 1977, the land use census shall also identify within a distance of 5 km (3 miles) the locations in each of the 16 meteorological sectors of all milk animals and all gardens of greater than 50 m² producing broad leaf vegetation.)

APPLICABILITY: At all times.

ACTION:

- a. With a land use census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Specification 4.11.2.3, in lieu of a Licensee Event Report, identify the new location(s) in the next Semiannual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.12.
- b. With a land use census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) 20 percent greater than at a location from which samples are currently being obtained in accordance with Specification 3.12.1, add the new location(s) to the radiological environmental monitoring program within 30 days. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after (October 31) of the year in which this land use census was conducted. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.12, identify the new location(s) in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the UDCM reflecting the new location(s).

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable. SURVEILLANCE REQUIREMENTS

4.12.2 The land use census shall be conducted during the growing season at least once per 12 months using that information that will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities. The results of the land use census shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

*Broad leaf vegetation sampling of at least three different kinds of vegetation may be performed at the site boundary in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. Specifications for broad leaf vegetation sampling in Table 3.12-1.4c shall be followed, including analysis of control samples.

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.3 INTERLABORATORY COMPARISON PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.3 Analyses shall be performed on radioactive materials supplied as part of an Interlaboratory Comparison Program that has been approved by the Commission.

APPLICABILITY: At all times.

ACTION:

- a. With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.
- D. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.3 The Interlaboratory Comparison Program shall be described in the ODCM. A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.11.

INSTRUMENTATION

BASES

3/4.3.3.10 RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The alarm/ trip setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50. The purpose of tank level indicating devices is to assure the detection and control of leaks that if not controlled could potentially result in the transport of radioactive materials to UNRESTRICTED AREAS.

3/4.3.3.11 RADIDACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The alarm/ trip setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. This instrumentation also includes provisions for monitoring (and controlling) the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50.

3/4.11 RADIOACTIVE EFFLUENTS

BASES

3/4.11.1 LIQUID EFFLUENTS

3/4.11.1.1 CONCENTRATION

This specification is provided to ensure that the concentration of radioactive materials released in liquid waste effluents to UNRESTRICTED AREAS will be less than the concentration levels specified in 10 CFR Part 20. Appendix B, Table II, Column 2. This limitation provides additional assurance that the levels of radioactive materials in bodies of water in UNRESTRICTED AREAS will result in exposures within (1) the Section II.A design objectives of Appendix I, 10 CFR Part 50, to a MEMBER OF THE PUBLIC and (2) the limits of 10 CFR Part 20.106(e) to the population. The concentration limit for dissolved or entrained noble gases is based upon the assumption that Xe-135 is the control-ling radioisotope and its MPC in air (submersion) was converted to an equivalent concentration in water using the methods described in International Commission on Radiological Protection (ICRP) Publication 2.

This specification applies to the release of liquid effluents from all reactors at the site.

The required detection capabilities for radioactive materials in liquid waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, <u>HASL-300</u> (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry," <u>Anal. Chem. 40</u>, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report <u>ARH-SA-215</u> (June 1975).

3/4.11.1.2 DOSE

This specification is provided to implement the requirements of Sections II.A, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Condition for Operation implements the guides set forth in Section II.A of Appendix I. The ACTION 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 liquid effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." Also, for fresh water sites with drinking water supplies that can be potentially affected by plant operations, there is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in the finished drinking water that are in excess of the requirements of 40 CFR Part 141. The dose calculation methodology and parameters in the ODCM implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The equations specified in the ODCM for calculating the doses due to the actual release rates of radioactive materials in liquid effluents are consistent with the methodology provided in

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Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.113, "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I," April 1977.

This specification applies to the release of liquid effluents from each reactor at the site. For units with shared radwaste treatment systems, the liquid effluents from the shared system are proportioned among the units sharing that system.

3/4.11.1.3 LIQUID RADWASTE TREATMENT SYSTEM

The requirement that the appropriate portions of this system be used, when specified, provides assurance that the releases of radioactive materials in liquid effluents will be kept "as low as is reasonably achievable". This specification implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and the design objective given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the liquid radwaste treatment system were specified as a suitable fraction of the dose design objectives set forth in Section II.A of Appendix I, 10 CFR Part 50, for liquid effluents.

This specification applies to the release of liquid effluents from each reactor at the site. For units with shared radwaste treatment systems, the liquid effluents from the shared system are proportioned among the units sharing that system.

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 II, Column 2, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.

3/4.11.2 GASEOUS EFFLUENTS

3/4.11.2.1 DOSE RATE

This specification is provided to ensure that the dose at any time at and beyond the SITE BOUNDARY from gaseous effluents from all units on the site will be within the annual dose limits of 10 CFR Part 20 to UNRESTRICTED AREAS. The annual dose limits are the doses associated with the concentrations of 10 CFR Part 20, Appendix B, Table II, Column 1. These limits provide reasonable

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assurance that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC in an UNRESTRICTED AREA, either within or outside the SITE BOUNDARY, to annual average concentrations exceeding the limits specified in Appendix B, Table II of 10 CFR Part 20 (10 CFR Part 20.106(b)). For MEMBERS OF THE PUBLIC who may at times be within the SITE BOUNDARY, the occupancy of that MEMBER OF THE PUBLIC will usually be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the SITE BOUNDARY. Examples of calculations for such MEMBERS OF THE PUBLIC, with the appropriate occupancy factors, shall be given in the ODCM. The specified release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to a MEMBER OF THE PUBLIC at or beyond the SITE BOUNDARY to less than or equal to 500 mrems/year to the total body or to less than or equal to 3000 mrems/year to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the inhalation pathway to less than or equal to 1500 mrems/year.

This specification applies to the release of gaseous effluents from all reactors at the site.

The required detection capabilities for radioactive materials in gaseous waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, <u>HASL-300</u> (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry," <u>Anal. Chem. 40</u>, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report <u>ARH-SA-215</u> (June 1975).

3/4.11.2.2 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 Condition for Operation implements the guides set forth in Section II.B of Appendix I. The ACTION 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 to UNRESTRICTED AREAS 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 be shown by calculational procedures based on models and data such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The dose calculation methodology and parameters established in the ODCM for calculating the doses due to the actual release rates of radioactive noble gases in gaseous effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors," Revision 1, July 1977.

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The ODCM equations provided for determining the air doses at and beyond the SITE BOUNDARY are based upon the historical average atmospheric conditions.

This specification applies to the release of gaseous effluents from each reactor at the site. For units with shared radwaste treatment systems, the gaseous effluents from the shared system are proporcioned among the units sharing that system.

3/4.11.2.3 DOSE - IODINE-131, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

This specification is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Conditions for Operation are the guides set forth in Section II.C of Appendix I. The ACTION 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 materials in gaseous effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." The ODCM calculational methods specified in the Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The ODCM calculational methodology and parameters for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors," Revision 1, July 1977. These equations also provide for determining the actual doses based upon the historical average atmospheric conditions. The release rate specifications for iodine-131, tritium, and radionuclides in particulate form with half lives greater than 8 days are dependent upon the existing radionuclide pathways to man, in the areas at and beyond the SITE BOUNDARY. The pathways that were examined in the development of these calculations were: 1) individual inhalation of airborne radionuclides, 2) deposition of radionuclides onto green leafy vegetation with subsequent consumption by man, 3) deposition onto grassy areas where milk animals and meat producing animals graze with consumption of the milk and meat by man, and 4) deposition on the ground with subsequent exposure of man.

This specification applies to the release of gaseous effluents from each reactor at the site. For units with shared radwaste treatment systems, the gaseous effluents from the shared system are proportioned among the units sharing that system.

3/4.11.2.4 GASEOUS RADWASTE TREATMENT SYSTEM

The requirement that the appropriate portions of these systems be used, when specified, provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable".

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This specification implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50, and the design objectives given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the systems were specified as a suitable fraction of the dose design objectives set forth in Sections II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents.

This specification applies to the release of gaseous effluents from each reactor at the site. For units with shared radwaste treatment systems, the gaseous effluents from the shared system are proportioned among the units sharing that system.

3/4.11.2.5 EXPLOSIVE GAS MIXTURE

This specification is provided to ensure that the concentration of potentially explosive gas mixtures contained in the waste gas holdup system is maintained below the flammability limits of hydrogen and oxygen. (Automatic control features are included in the system to prevent the hydrogen and oxygen concentrations from reaching these flammability limits. These automatic control features include isolation of the source of hydrogen and/or oxygen, automatic diversion to recombiners, or injection of dilutants to reduce the concentration below the flammability limits.) Maintaining the concentration of hydrogen and oxygen below their flammability limits provides assurance that the releases of radioactive materials will be controlled in conformance with the requirements of General Design Criterion 60 of Appendix A to 10 CFR Part 50.

3/4.11.2.6 GAS STORAGE TANKS

The tanks included in this specification are those tanks for which the quantity of radioactivity contained is not limited directly or indirectly by another Technical Specification to a quantity that is less than the quantity that provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting total body exposure to a MEMBER OF THE PUBLIC at the nearest SITE BOUNDARY will not exceed 0.5 rem in an event of 2 hours duration.

Restricting the quantity of radioactivity contained in each gas storage tank provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting total body exposure to a MEMBER OF THE PUBLIC at the nearest SITE BOUNDARY will not exceed 0.5 rem. This is consistent with Branch Technical Position ETSB 11-5 in NUREG-0800, July 1981.

3/4.11.3 SOLID RADIOACTIVE WASTE

This specification implements the requirements of 10 CFR Part 50.36a and General Design Criterion 60 of Appendix A to 10 CFF Part 50. The process parameters included in establishing the PROCESS COF ROL PROGRAM may include, but are not limited to waste type, waste pH, waste/liquid/solidification agent/ catalyst ratios, waste oil content, waste principal chemical constituents, and mixing and curing times.

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3/4.11.4 TOTAL DOSE

This specification is provided to meet the dose limitations of 40 CFR Part 190 that have been incorporated into 10 CFR Part 20 by 46 FR 18525. The specification requires the preparation and submittal of a Special Report whenever the calculated doses from plant generated radioactive effluents and direct radiation exceed 25 mrems to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems. For sites containing up to 4 reactors, it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within twice the dose design objectives of Appendix I, and if direct radiation doses from the reactor units and outside storage tanks are kept small. The Special Report will describe a course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered. If the dose to any MEMBER OF THE PUBLIC is estimated to exceed the requirements of 40 CFR Part 190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR Part 190.11 and 10 CFR Part 20.405c, is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190, and does not apply in any way to the other requirements for dose limitation of 10 CFR Part 20, as addressed in Specifications 3.11.1.1 and 3.11.2.1. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle.

3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

BASES

3/4.12.1 MONITORING PROGRAM

The radiological environmental monitoring program required by this specification provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the station operation. This monitoring program implements Section IV.B.2 of Appendix I to 10 CFR Part 50 and thereby supplements the radiological effluent monitoring program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways. Guidance for this monitoring program is provided by the Radiological Assessment Branch Technical Position on Environmental Monitoring. The initially specified monitoring program will be effective for at least the first three years of commercial operation. Following this period, program changes may be initiated based on operational experience.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs required by Table 4.12-1 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

Detailed discussion of the LLD, and other detection limits, can be found in HASL Procedures Manual, <u>HASL-300</u> (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination - Application to Radiochemistry," <u>Anal. Chem. 40</u>, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report <u>ARH-SA-215</u> (June 1975).

3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

BASES

3/4.12.2 LAND USE CENSUS

This specification is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the radiological environmental monitoring program are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey or from consulting with local agricultural authorities shall be used. This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. Restricting the census to gardens of greater than 50 m² provides assurance that significant exposure pathways via leafy vegetables will be identified and monitored since a garden of this size is the minimum required to produce the quantity (26 kg/year) of leafy vegetables assumed in Regulatory Guide 1.109 for consumption by a child. To determine this minimum garden size, the following assumptions were made: 1) 20% of the garden was used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage), and 2) a vegetation yield of 2 kg/m².

3/4.12/3 INTERLABORATORY COMPARISON PROGRAM

The requirement for participation in an approved Interlaboratory Comparison Program is provided to ensure that independent checks on the precision and accuracy of the measurements of radioactive material in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring in order to demonstrate that the results are valid for the purposes of Section IV.B.2 of Appendix I to 10 CFR Part 50.

5.0 DESIGN FEATURES

5.1 SITE

MAP DEFINING UNRESTRICTED AREAS FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS

5.1.3 Information regarding radioactive gaseous and liquid effluents, which will allow identification of structures and release points as well as definition of UNRESTRICTED AREAS within the SITE BOUNDARY that are accessible to MEMBERS OF THE PUBLIC, shall be as shown in Figure 5.1-3.

The definition of UNRESTRICTED AREA used in implementing the Radiological Effluent Technical Specifications has been expanded over that in 10 CFR 20.3 (a)(17). The UNRESTRICTED AREA boundary may coincide with the exclusion (fenced) area boundary, as defined in 10 CFR 100.3(a), but the UNRESTRICTED AREA does not include areas over water bodies. The concept of UNRESTRICTED AREAS, established at or beyond the SITE BOUNDARY, is utilized in the LIMITING CONDITIONS FOR OPERATION to keep levels of radioactive materials in liquid and gaseous effluents as low as is reasonably achievable, pursuant to 10 CFR 50.36a.

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This figure shall consist of a map of the site area showing the SITE BOUNDARY and locating points within the SITE BOUNDARY where radioactive gaseous and liquid effluents are released, as well as where radioactive liquid effluents leave the site. If onsite areas subject to radioactive materials in gaseous or liquid effluents are utilized by the public for recreational or other purposes, these areas shall be outlined on the map and identified by occupancy factors and the licensee's method of occupancy control (if any). The figure shall be sufficiently detailed to allow identification of structures and release point locations and elevations, as well as definition of UNRESTRICTED AREAS within the SITE BOUNDARY that are accessible to MEMBERS OF THE PUBLIC. The map scale shall be on the order of 2-3"/mile. See NUREG-0133 for additional guidance.

MAP DEFINING UNRESTRICTED AREAS FOR RADIOACTIVE GASEDUS AND LIQUID EFFLUENTS

FIGURE 5.1-3

6.5.1 UNIT REVIEW GROUP (URG)

RESPONSIBILITIES

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- 6.5.1.6 The URG shall be responsible for:
 - k. Review of any accidental, unplanned or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the (Superintendent of Power Plants) and to the (Company Nuclear Review and Audit Group).
 - Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

6.5.2 COMPANY NUCLEAR REVIEW AND AUDIT GROUP (CNPAG)

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the (CNRAG). These audits shall encompass:

- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- n. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.
- Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement unless otherwise noted.

THIRTY DAY WRITTEN REPORTS

6.9.1.9 The types of events listed below shall be the subject of written reports to the Director of the Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the Technical Specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
- D. Conditions leading to operation in a degraded mode permitted by a Limiting Condition for Operation or plant shutdown required by a Limiting Condition for Operation.
- c. Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.
- d. Abnormal degradation of systems other than those specified in 6.9.1.8.c above designed to contain radioactive material resulting from the fission process.

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ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.11 Routine Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, with operational controls as appropriate, and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.12.2.

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the Table and Figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Progres, required by Specification 3.12.3; discussion of all deviations from the sampling schedule of Table 3.12-1; and discussion of all analyses in which the LLD required by Table 4.12-1 was not achievable.

*A single submittal may be made for a multiple unit station.

^{**}One map shall cover stations near the site boundary; a second shall include the more distant stations.

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SEMIANNUAL RADIDACTIVE EFFLUENT RELEASE REPORT*

6.9.1.12 Routine Radioactive Effluent Release Reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

The Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

The Radioactive Effluent Release Report to be submitted within 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.** This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY (Figure 5.1-3) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses. [For ORs: approximate and conservative approximate methods are acceptable.] The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

The Radioactive Effluent Release Report to be submitted 60 days after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power

**In lieu of submission with the first half year Radioactive Effluent Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request.

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^{*}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.

Operation. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1, October 1977.

The Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

- a. Container volume,
- Total curie quantity (specify whether determined by measurement or estimate),
- Principal radionuclides (specify whether determined by measurement or estimate),
- Source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent or absorbent (e.g., cement, urea formaldehyde).

The Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSI'E DOSE CALCULATION MANUAL (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.12.2.

SPECIAL REPORTS

Special reports may be required covering inspections, test and maintenance activities. These special reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.

6.9.2 Special reports shall be submitted to the Director of the NRC Regional Office listed in Appendix D, 10 CFR Part 20, with a copy to the Director, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555 within the time period specified for each report.

6.10 RECORD RETENTION

6.10.2 The following records shall be retained for the duration of the Unit Operating License:

n. 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 should include procedures effective at specified times and QA records showing that these procedures were followed.

6.15 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT

6.15.1 Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid):

- Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the (Unit Review Group). The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50,59.
 - Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. An evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
 - e. An evaluation of the change, which shows the expected maximum exposures to individual in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - f. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - g. In estimate of the exposure to plant operating personnel as a result of the change; and
 - Documentation of the fact that the change was reviewed and found acceptable by the (URG).
- 2. Shall become effective upon review and acceptance by the (URG).

*Licensees may chose to submit the information called for in this Specification as part of the annual FSAR update.