

ATTACHMENT A

Proposed Revised Technical Specification Page 5.12-1 and New Page 5.12-2.

CDF89158.LTR

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## 5.12 HIGH RADIATION AREA

5.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is at such levels that a major portion of the body could receive in any one hour a dose in excess of 100 mrem shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit.\* Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. A radiological controls qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and who will perform periodic radiation surveillance at the frequency specified in the RWP. The surveillance frequency will be established by the Radiation Protection Manager. ]

5.12.2 Locked doors shall be provided to high radiation areas in which the radiation intensity is at such levels that a major portion of the body could receive in any one hour a dose in excess of 1000 mrem\*\* ] to prevent unauthorized access to those areas. Keys to those doors shall be maintained under the administrative control of the Plant Shift Superintendent on duty and/or the Radiation Protection Manager. ]

\*Radiological Controls personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

\*\*Measurement made at 18" from the source of radioactivity. ]

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Doors shall remain locked except during periods of access by personnel under access administrative controls. Access administrative controls shall include an approved RWP, measures to prevent unauthorized access, and measures for control of exposure. Access administrative controls may include remote surveillance (such as use of closed circuit TV cameras or teledosimetry) by personnel appropriately qualified in radiation protection procedures.

In the case of areas established for a period of 30 days or less which would otherwise require the controls of this section, direct surveillance to prevent unauthorized entry may be substituted for the locked door.

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## ATTACHMENT B

### SIGNIFICANT HAZARDS EVALUATION

#### Description of Proposed Change

The proposed change provided in Attachment A would clarify the Administrative Control requirements of Technical Specification 5.12.2 for high radiation area locked door controls. This clarification consists of three points. First, measurement clarification is provided for the 1000 mrem value for which the specification was written. Second, an added paragraph addresses administrative controls for unlocking the locked doors for access; remote surveillance would be allowed as part of these administrative controls. Third, an additional added paragraph would allow direct surveillance in lieu of locked doors for applicable areas established for a period of 30 days or less.

The proposed change also reflects a new organizational position of Radiation Protection Manager.

#### Significant Hazards Evaluation

The proposed change to the Technical Specifications, to clarify Section 5.12.2 for high radiation area locked door controls, has been evaluated against the standards of 10 CFR 50.92 and has been determined to not involve a significant hazards consideration. The proposed change does not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is administrative in nature and clarifies an administrative section of the Technical Specifications. The proposed clarification would address three points on administrative requirements for locked high radiation area access controls. A clarification of the measurement criteria of the 1000 mrem value is taken directly from Standard Technical Specifications. An added paragraph which addresses administrative controls for unlocking locked doors for access is considered to be consistent with controls provided by Standard Technical Specifications. An added paragraph allowing direct surveillance in lieu of locked doors for short term areas is taken from 10 CFR 20.203(c)(4). The two added paragraphs will afford opportunities to reduce personnel radiation exposure, incident to establishing and maintaining controls for the subject areas, without impacting on the intended access and exposure control requirements of the specification.

ATTACHMENT B

SIGNIFICANT HAZARDS EVALUATION  
(continued)

The proposed change also reflects a new organizational position of Radiation Protection Manager whose responsibilities include those currently delineated for the Radiological Controls Section Head in Specification 5.12.

Neither the current Technical Specifications nor the specifications as changed have, or would have, an effect on the physical plant nor on the operation or maintenance of the physical plant. The proposed change would, therefore, have no impact on the probability or consequences of an operational event. The proposed change, therefore, has no effect on the probability or consequences of any previously evaluated accident.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

As discussed in item 1, above, the proposed change is administrative in nature and does not have an effect on the physical plant nor on the operation or maintenance of the physical plant. Therefore, inclusion of the proposed change in the Technical Specifications would not create the possibility of a new or different kind of accident from any previously evaluated.

3. Involve a significant reduction in a margin of safety.

As discussed in item 1, above, the proposed change is administrative in nature and does not have an effect on the physical plant nor on the operation or maintenance of the physical plant. Therefore, adoption of the proposed change would not involve a significant reduction in safety margin for the plant.

Maine Yankee has concluded that the proposed change to the Technical Specifications does not involve a significant hazards consideration as defined by 10 CFR 50.92.