GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775

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U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

Gulf States Utilities Company (GSU) hereby files an application to amend the River Bend Station - Unit 1 Technical Specifications, Appendix A to Facility Operating License NPF-47, pursuant to 10 CFR 50.90. This application is filed to change the following Technical Specifications:

3.3.7.10	"Radioactive Liquid Effluent Monitoring Instrumentation"
3.3.7.11	"Radioactive Gaseous Effluent Monitoring Instrumentation"
Table 4.11.1.1-1	"Radioactive Liquid Waste Sampling and Analysis Program"
3.11.1.4	"Liquid Holdup Tanks"
Table 4.11.2.1.2-1	"Radioactive Gaseous Waste Sampling and Analysis Program"
3.12.1	"Monitoring Program"
Table 3.12.1-1	"Radiological Environmental Monitoring Program"
3.12.2	"Land Use Census"

The Attachments to this letter provide the justifications, significant hazards consideration and proposed revisions to the Technical Specifications.

A001 1/1 Add: NRR/DRSS/PRPB

Should you have any questions, please contact Mr. L.L. Dietrich of my staff at (504) 381-4866.

Sincerely,

J. E. Booker

J.E. Booker
Manager - Safety Assessment
and Quality Verification
River Bend Nuclear Group

DNL/LLD/JCM/kvm
IR wp
Attachments

cc: U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

Department of Environmental Quality
Radiation Protection Division
P.O. Box 82135
Baton Rouge, LA 70884-2135
ATTN: Administrator

Mr. E. T. Baker
M/S OWFN 13-H-15
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)

PARISH OF WEST FELICIANA)

Docket No. 50-458

In the Matter of)

GULF STATES UTILITIES COMPANY)

(River Bend Station - Unit 1)

AFFIDAVIT

J. E. Booker, being duly sworn, states that he is a Manager-Safety Assessment and Quality Verification for Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

J. E. Booker

J. E. Booker

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 2nd day of July, 1993. My Commission expires with Life.

Claudia F. Hurst

Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ATTACHMENT 1

PROPOSED
GULF STATES UTILITIES COMPANY
RIVER BEND STATION
DOCKET 50-458/LICENSE NO. NPF-47
(93-08)

LICENSING DOCUMENT INVOLVED: TECHNICAL SPECIFICATIONS

REASON FOR REQUEST:

In accordance with 10 CFR 50.90, Gulf States Utilities Company (GSU) is requesting changes to the following River Bend Station (RBS) Technical Specifications (TS):

3.3.7.10	"Radioactive Liquid Effluent Monitoring Instrumentation"
3.3.7.11	"Radioactive Gaseous Effluent Monitoring Instrumentation"
Table 4.11.1.1-1	"Radioactive Liquid Waste Sampling and Analysis Program"
3.11.1.4	"Liquid Holdup Tanks"
Table 4.11.2.1.2-1	"Radioactive Gaseous Waste Sampling and Analysis Program"
3.12.1	"Monitoring Program"
Table 3.12.1-1	"Radiological Environmental Monitoring Program"
3.12.2	"Land Use Census"

These changes revise the frequency for submittal of the Radioactive Effluent Release Reports from semiannual to annual and extend the preparation period from 60 days to 90 days. This action was discussed in *Federal Register* Vol. 57, No. 169, dated August 31, 1992. The extension reduces the possibilities of having to file an addendum due to composite data.

Additionally, these changes revise the listed reference for acceptable calculation methods from 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, to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants." This will allow GSU to use computer based calculations in preparing the report.

DISCUSSION:

Routine Semiannual Radioactive Effluent Release Reports covering the operation of the unit during the previous 6 months of operation are currently submitted within 60 days after January 1 and July 1 of each year. The report includes a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the facility 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 as well as a summary of hourly meteorological data collected over the previous year (January 1 report only), and an assessment of the radiation doses from radioactive liquid and gaseous effluents to members of the public due to activities inside the site boundary during the report period. All assumptions used involving these assessments (i.e., specific activity, exposure time and location) are included in these reports. The assessment of radiation doses is performed in accordance with the methodology and parameters of the offsite dose calculation manual (ODCM).

The Semiannual Radioactive Effluent Release Report submitted 60 days after January 1 of each year also includes 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, "Environment Radiation Protection Standards for Nuclear Power Operation."

The reports also include a list and description of unplanned releases of radioactive materials in gaseous and liquid effluents from the site to unrestricted areas made during the reporting period and any changes made during the reporting period to the process control program (PCP) and to the ODCM, as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census.

The proposed changes to RBS TS would decrease neither the detail nor the range of information currently provided. Instead, it would simply change the frequency for submitting the Radioactive Effluent Release Report and increase the preparation period so as to reduce the possibility of having to file an addendum due to composite data.

The change in frequency of submission was proposed and accepted as a final rule by the Nuclear Regulatory Commission and was posted in the *Federal Register,* Volume 87, Number 169, dated August 3, 1992, as one of several actions initiated to reduce the regulatory burden on licensees. The discussion states:

> "This action reduces the requirements for the submission of reports concerning the quantity of principal nuclides released to unrestricted areas in liquid and gaseous effluents from semiannually to annually.

> The estimated savings for this action, assuming an average remaining plant life of 26 years is $16,800,000 for licensees and $360,000 for the NRC."

Changing the listed reference for acceptable calculation methods from 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," to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," will allow GSU to use a new enhanced computer based software to prepare the report.

The methodology discussed in NUREG-0133 and used to implement the requirements of 10 CFR Part 50, Appendix I, "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion 'As Low As Practicable' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents" is consistent with the Regulatory Guides used in the staff's safety evaluations pursuant to 10 CFR 50.34a(c), including Regulatory Guide 1.109.

REVISED TECHNICAL SPECIFICATION:

The requested revision is provided in Attachment 3.

SCHEDULE FOR ATTAINING COMPLIANCE:

GSU is currently in compliance with the applicable RBS TS requirements and requests approval of this change be granted as soon as possible, specifically, before August 29, 1993, to preclude the necessity for submitting the July 1 Radioactive Effluent Release Report.

NOTIFICATION OF STATE PERSONNEL:

A copy of this amendment request has been provided to the State of Louisiana, Department of Environmental Quality - Radiation Protection Division.

ENVIRONMENTAL IMPACT APPRAISAL:

GSU has reviewed the proposed license amendment against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, GSU concludes that the proposed change meets the criteria given in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

ATTACHMENT 2
SIGNIFICANT HAZARDS CONSIDERATION

In accordance with the requirements of 10 CFR 50.92, the following discussions are provided in support of the determination that no significant hazards are created or increased by the change proposed by this submittal.

The proposed changes to the River Bend Station (RBS) Technical Specifications (TS) involve changing the frequency for submitting the Radioactive Effluent Release Report from semiannual to annual and increasing the preparation period from 60 days to 90 days. Additionally, the listed reference for acceptable calculation methods will be changed from 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," to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants." As such, this proposed amendment does not affect the safety analysis assumptions, the design basis, or the margin of safety. Operation of RBS in accordance with the changes proposed in this amendment request involves no significant hazards based upon the evaluation given below.

A. The change being implemented is an administrative alteration of RBS TS and does not cause a significant increase in the probability or consequences of a previously evaluated accident. This change involves a decrease in the frequency of the effluent release report from twice a year to once per year; additionally, the report preparation time is extended from 60 days to 90 days in accordance with allowances given in the *Federal Register*. Also, due to acquiring new effluent tracking software, the reference for acceptable methods of calculating liquid and gaseous effluents is being changed from Regulatory Guide 1.109 to NUREG-0133.

B. This change does not create any possible new accidents or variations of accidents previously evaluated. This change is administrative only. This change alters the frequency of and preparation time for the effluent report. Additionally, this change notes that due to new computer software, NUREG-0133, will be referenced as the source of acceptable methods of calculating liquid and gaseous effluents.

C. This change does not present any reduction in any margin of safety because this change is administrative. The administrative section of TBS TS is being changed to adopt the NRC's new annual frequency for effluent reports and concurrently, to extend the preparation time from 60 days to 90 days. Additionally, the reference listed for acceptable methods of calculating liquid and gaseous effluents is being changed from Regulatory Guide 1.109 to NUREG-0133.

Based on the above, it is determined that the proposed change does not (1) involve a significant increase in the probability of consequences of an accident previously evaluated, (2) create the probability of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety and, therefore, does not involve a significant hazard consideration.