ATTACHMENT C

ZION NUCLEAR GENERATING STATION

PROPOSED CHANGES TO

TECHNICAL SPECIFICATIONS

FOR

TSCR No. 91-06

HIGH RADIATION AREA CONTROLS

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ZION TECHNICAL SPECIFICATIONS

INDICATING PROPOSED CHANGES

FOR

TSCR No. 91-06

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6.2. Plant Operating Procedures

1. Written procedures including applicable checkoff lists covering items listed below shall be prepared, implemented, and maintained:

   A. Normal startup, operation, and shutdown of the reactor and other systems and components involving nuclear safety of the facility.

   B. Refueling operations.

   C. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components including responses to alarms, suspected primary system leaks, and abnormal reactivity changes.

   D. Emergency conditions involving potential or actual release of radioactivity – "Generating Stations Emergency Plan" and station emergency and abnormal procedures.

   E. Instrumentation operation which could have an effect on the safety of the facility.

   F. Preventive and corrective maintenance operations which could have an effect on the safety of the facility.

   G. Surveillance and testing requirements.

   H. Tests and experiments.

   I. Procedures to ensure safe shutdown of the plant.

   J. Station Security Plan and implementing procedures.

   K. Fire Protection Program implementation.

   L. Post Accident Sampling Program

   M. Working hours of the Shift Engineer, Shift Control Room Engineer, Shift Foreman, and Nuclear Station Operator such that the heavy use of overtime is not routinely required.

2. Radiation control procedures shall be prepared, implemented and maintained. These procedures shall specify permissible radiation exposure limits and shall be consistent with the requirements of 10CFR 20. The radiation protection program shall meet the requirements of 10CFR 20.

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6.2.2 Radiation Protection Program

6.2.2.A Radiation control procedures shall be prepared, implemented, and maintained. These procedures shall specify permissible radiation exposure limits and shall be consistent with the requirements of 10 CFR 20. The radiation protection program shall meet the requirements of 10 CFR 20.

6.2.2.B High Radiation Area

6.2.2.B.1 Pursuant to Paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/hr at 30 cm from the radiation source or from any surface which the radiation penetrates 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 (RWP). Individuals qualified in radiation protection procedures or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/hr, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. 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; or

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 levels in the area have been established and personnel have been made knowledgeable of them; or

c. An individual 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 shall perform periodic radiation surveillance at the frequency specified in the Radiation Work Permit.

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6.2.2.B (Continued)

6.2.2.B.2 a. In addition to the requirements of Specification 6.2.2.B.1, areas accessible to personnel with radiation levels greater than 1000 mR/hr at 30 cm from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the operating shift supervision on duty and/or health physics supervision. Personnel access and exposure control over activities being performed within these areas shall be specified by an approved RWP. During emergency situations which involve personnel injury or actions taken to prevent major equipment damage, continuous surveillance and radiation monitoring of the work area by a qualified individual may be substituted for the routine RWP procedure.

b. For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/hr, that are located within large areas, including the containment outside the missile barrier, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded (by a more substantial obstacle than a rope), conspicuously posted, and a flashing light shall be activated as a warning device.

c. For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/hr, that are located within the containment inside the missile barrier, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, the access control shall be per the following:

1. The missile barrier ingress/egress points shall be barricaded, locked and conspicuously posted; or

2. The missile barrier ingress/egress points shall be conspicuously posted and have direct or remote (such as closed circuit TV cameras) continuous surveillance made by personnel qualified in radiation protection procedures to provide positive access control.

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PROPOSED CHANGES TO

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