

Attachment 2

Proposed Changes to T.S. Pages

Unit 1

Remove Page I	Replace with I
Remove Page XIX	Replace with XIX
Remove Page XX	Replace with XX
Remove Page 1-6	Replace with 1-6
Remove Page 6-8	Replace with 6-8
Remove Page 6-10	Replace with 6-10
Remove Page 6-14	Replace with 6-14
Remove Page 6-15a	Replace with 6-15a
Remove Page 6-19	Replace with 6-19
Delete Page 6-20	
Delete Page 6-21	
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Renumber Page 6-24 to Page 6-22	
Renumber Page 6-25 to Page 6-23	
Renumber Page 6-26 to Page 6-24	

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REACTOR TRIP SYSTEM RESPONSE TIME

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SOURCE CHECK

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STAGGERED TEST BASIS

1.31 A STAGGERED TEST BASIS shall consist of:

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- a. All administrative procedures and changes thereto,
- b. The safety evaluations for 1) procedures, 2) changes to procedures, equipment or systems, and 3) tests or experiments completed under the provision of Section 50.59, 10CFR, to verify that such actions did not constitute an unreviewed safety question and all programs required by Specification 6.8 and changes thereto.
- c. Proposed procedures and changes to procedures, equipment or systems which may involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- d. Proposed tests or experiments which may involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- e. Proposed changes to Technical Specifications or this Operating License.
- f. Reports of violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance or reports of abnormal degradation of systems designed to contain radioactive material.
- g. Reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- h. All REPORTABLE EVENTS.
- i. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- j. The plant Security Plan.
- k. The Emergency Plan.
- l. Facility operations to detect potential nuclear safety hazards.
- m. Investigations or analyses of special subjects as requested by the Chairman of the Nuclear Operations Review Board.
- n. Every unexpected onsite release of radioactive material to the environs resulting from a lack of preplanning including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Plant Manager and to the Nuclear Operations Review Board.
- o. Changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

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ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the NORB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NORB activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NORB Chairman to provide expert advice to the NORB.

MEETING FREQUENCY

6.5.2.5 The NORB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.

QUORUM

6.5.2.6 A quorum shall consist of the Chairman or Vice Chairman plus enough voting members to constitute a majority of the NORB. No more than a minority of the quorum shall have line responsibility for operation of the facility. For the purpose of a quorum those considered to have line responsibility will include the Plant Manager and personnel reporting to the Plant Manager.

REVIEW

6.5.2.7 The NORB shall review:

- a. Proposed changes to procedures, equipment or systems which involve an reviewed safety question as defined in Section 50.59, 10CFR.
- b. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- c. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance or abnormal degradation of systems designed to contain radioactive material.
- d. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- e. All REPORTABLE EVENTS.
- f. Recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.

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6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NORB and the Vice President - Nuclear Generation.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and all cases within one hour. The Vice President, Nuclear Generation shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, and the Vice President, Nuclear Generation, with a copy to the Manager of Nuclear Operations and Administration, for NORB review within 14 days of the violation.

6.8 PROCEDURES AND PROGRAMS

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

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.

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6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

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.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

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- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent (e.g., cement, urea formaldehyde).

The radioactive effluent release reports shall include unplanned releases from the site to unrestricted areas of radioactive materials in gaseous and liquid effluents on a quarterly basis.

The radioactive effluent release reports shall include any changes to the PROCESS CONTROL PROGRAM (PCP) made during the reporting period.

MONTHLY OPERATING REPORT

6.9.1.10 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORV's or safety valves shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office of Inspection and Enforcement, no later than the 15th of each month following the calendar month covered by the report.

Any changes to the OFFSITE DOSES CALCULATION MANUAL shall be submitted with the Monthly Operating Report within 90 days in which the change(s) was made effective. In addition, a report of any major changes to the radioactive waste treatment systems shall be submitted with the Monthly Operating Report for the period in which the change was implemented.

RADIAL PEAKING FACTOR LIMIT REPORT

6.9.1.11 The F_{xy} limit for Rated Thermal Power (F_{xy}) shall be provided to the Director of the Regional Office of Inspection and Enforcement, with a copy to the Director, Nuclear Reactor Regulation, Attention Chief of the Core Performance Branch, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555 for all core planes containing bank "D" control rods and all unrodded core planes at least 60 days prior to cycle initial criticality. In the event that the limit would be submitted at some other time during core life, it will be submitted 60 days prior to the date the limit would become effective unless otherwise exempted by the Commission.

Any information needed to support F_{xy} will be by request from the NRC and need not be included in this report.

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SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Director of the Office of Inspection and Enforcement Regional Office within the time period specified for each report.

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE EVENTS submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specification 6.8.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.

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- h. Records of annual physical inventory of all sealed source material of record.

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

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the facility staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PORC and the NORB.
- l. Records of secondary water sampling and water quality.
- m. Records of analyses required by the radiological environmental monitoring program.
- n. Records of the service lives of all hydraulic and mechanical snubbers listed on Tables 3.7-4a and 3.7-4b including the date at which the service life commences and associated installation and maintenance records.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

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6.12 HIGH RADIATION AREA

6.12.1 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 greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit.* Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. A health physics 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 shall perform periodic radiation surveillance at the frequency specified by the facility Health Physics Supervisor.

6.12.2 In addition to the requirements of 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1000 mrem shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Foreman on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved Radiation Work Permit which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem** that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, direct or remote (such as use of closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are following plant radiation protection procedures for entry into high radiation areas.

**Measurement made at 18" from source of radioactivity.

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6.13. PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the semi-annual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - b. A determination that the change did not reduce the overall conformance of the solidified waste program to existing criteria for solid wastes; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC.
2. Shall become effective upon review and approval in accordance with Specification 6.5.3.1.

6.14. OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Monthly Operating Report within 90 days of the date the change(s) was made effective. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);
 - b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC
2. Shall become effective upon review and approval in accordance with Specification 6.5.3.1.

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6.15 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS (Liquid, Gaseous, and solid)

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

1. Shall be reported to the Commission in the Monthly Operating Report for the period in which the change was implemented. 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 50.59;
 - b. 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. An estimate of the exposure to plant operating personnel as a result of the change; and
 - h. Documentation of the fact that the change was reviewed and found acceptable by the PORC.
2. Shall become effective upon review and approval in accordance with 6.5.3.1.

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QUORUM

6.5.2.6 A quorum shall consist of the Chairman or Vice Chairman plus enough voting members to constitute a majority of the NORB. No more than a minority of the quorum shall have line responsibility for operation of the facility. For the purpose of a quorum those considered to have line responsibility will include the Plant Manager and personnel reporting to the Plant Manager.

REVIEW

6.5.2.7 The NORB shall review:

- a. Proposed changes to procedures, equipment or systems which involve an reviewed safety question as defined in Section 50.59, 10CFR.
- b. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10CFR.
- c. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance or abnormal degradation of systems designed to contain radioactive material.
- d. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- e. All REPORTABLE EVENTS.
- f. Recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NORB and the Vice President - Nuclear Generation.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and all cases within one hour. The Vice President, Nuclear Generation shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, and the Vice President, Nuclear Generation, with a copy to the Manager of Nuclear Operations and Administration, for NORB review within 14 days of the violation.

6.8 PROCEDURES AND PROGRAMS

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

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

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.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

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- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent (e.g., cement, urea formaldehyde).

The radioactive effluent release reports shall include unplanned releases from the site to unrestricted areas of radioactive materials in gaseous and liquid effluents on a quarterly basis.

The radioactive effluent release reports shall include any changes to the PROCESS CONTROL PROGRAM (PCP) made during the reporting period.

MONTHLY OPERATING REPORT

6.9.1.10 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORV's or safety valves shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office of Inspection and Enforcement, no later than the 15th of each month following the calendar month covered by the report.

Any changes to the OFFSITE DOSES CALCULATION MANUAL shall be submitted with the Monthly Operating Report within 90 days in which the change(s) was made effective. In addition, a report of any major changes to the radioactive waste treatment systems shall be submitted with the Monthly Operating Report for the period in which the change was implemented.

RADIAL PEAKING FACTOR LIMIT REPORT

6.9.1.11 The F_{xy} limit for Rated Thermal Power (F_{xy}) shall be provided to the Director of the Regional Office of Inspection and Enforcement, with a copy to the Director, Nuclear Reactor Regulation, Attention Chief of the Core Performance Branch, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555 for all core planes containing bank "D" control rods and all unrodded core planes at least 60 days prior to cycle initial criticality. In the event that the limit would be submitted at some other time during core life, it will be submitted 60 days prior to the date the limit would become effective unless otherwise exempted by the Commission.

Any information needed to support F_{xy} will be by request from the NRC and need not be included in this report.

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SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Director of the Office of Inspection and Enforcement Regional Office within the time period specified for each report.

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE EVENTS submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specification 6.8.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.

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- h. Records of annual physical inventory of all sealed source material of record.

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

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the facility staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PORC and the NORB.
- l. Records of secondary water sampling and water quality.
- m. Records of analyses required by the radiological environmental monitoring program.
- n. Records of the service lives of all hydraulic and mechanical snubbers listed on Tables 3.7-4a and 3.7-4b including the date at which the service life commences and associated installation and maintenance records.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

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6.12 HIGH RADIATION AREA

6.12.1 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 greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit.^{*} Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. A health physics 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 shall perform periodic radiation surveillance at the frequency specified by the facility Health Physics Supervisor.

6.12.2 In addition to the requirements of 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1000 mrem shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Foreman on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved Radiation Work Permit which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem^{**} that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, direct or remote (such as use of closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

^{*}Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are following plant radiation protection procedures for entry into high radiation areas.

^{**}Measurement made at 12" from source of radioactivity.

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6.13. PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the semi-annual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - b. A determination that the change did not reduce the overall conformance of the solidified waste program to existing criteria for solid wastes; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC.
2. Shall become effective upon review and approval in accordance with Specification 6.5.3.1.

6.14. OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Monthly Operating Report within 90 days of the date the change(s) was made effective. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);
 - b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the PORC
2. Shall become effective upon review and approval in accordance with Specification 6.5.3.1.

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6.15 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS (Liquid, Gaseous, and solid)

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

1. Shall be reported to the Commission in the Monthly Operating Report for the period in which the change was implemented. 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 50.59;
 - b. 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. An estimate of the exposure to plant operating personnel as a result of the change; and
 - h. Documentation of the fact that the change was reviewed and found acceptable by the PORC.
2. Shall become effective upon review and approval in accordance with 6.5.3.1.