



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 72 TO FACILITY OPERATING LICENSE NO. NPF-58

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, ET AL.

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

DOCKET NO. 50-440

1.0 INTRODUCTION

By letter dated April 3, 1995, The Cleveland Electric Illuminating Company (the licensee) proposed to incorporate programmatic controls for radiological effluent and radiological environmental monitoring in the Administrative Controls section of the Technical Specifications (TS) consistent with the requirements of 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. At the same time, the licensee proposed to transfer the procedural details of the Radiological Effluent Technical Specifications (RETS) from the TS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP) for solid radioactive wastes, as appropriate. With these changes, the specifications related to RETS reporting requirements were simplified. Finally, a change to the definition of the ODCM was proposed consistent with these changes. Guidance on these proposed changes was provided to all power reactor licensees and applicants by Generic Letter (GL) 89-01 dated January 31, 1989.

2.0 EVALUATION

The licensee's proposed changes to the TS are consistent with the guidance provided in Generic Letter 89-01 and are addressed below.

The licensee has proposed to incorporate programmatic controls for radioactive effluent and radiological environmental monitoring in TS 6.8.4 as noted in the guidance provided in GL 89-01. The programmatic controls ensure that programs are established, implemented, and maintained to ensure that operating procedures are provided to control radioactive effluent consistent with the requirements of 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50.

The licensee has confirmed that the detailed procedural requirements addressing Limiting Conditions for Operation, their applicability, remedial actions, associated surveillance requirements, or reporting requirements for the following specifications have been prepared to implement the relocation of these procedural details to the ODCM or PCP. These changes to the ODCM and PCP have been prepared in accordance with the new Administrative Controls in the TS on changes to the ODCM and PCP so that they will be implemented in the ODCM or PCP when this amendment is implemented.

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| <u>SPECIFICATION</u> | <u>TITLE</u>  |
|----------------------|---|
| 3/4.3.7.9            | RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION  |
| 3/4.3.7.10           | RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION   |
| 3/4.11.1.1           | LIQUID EFFLUENT: CONCENTRATION  |
| 3/4.11.1.2           | LIQUID EFFLUENT: DOSE   |
| 3/4.11.1.3           | LIQUID EFFLUENT: LIQUID RADWASTE TREATMENT SYSTEM   |
| 3/4.11.2.1           | GASEOUS EFFLUENT: DOSE RATE   |
| 3/4.11.2.2           | GASEOUS EFFLUENT: DOSE - NOBLE GASES  |
| 3/4.11.2.3           | GASEOUS EFFLUENT: DOSE - IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM |
| 3/4.11.2.4           | GASEOUS EFFLUENT: GASEOUS RADWASTE (OFFGAS) TREATMENT   |
| 3/4.11.2.5           | GASEOUS EFFLUENT: VENTILATION EXHAUST TREATMENT SYSTEMS   |
| 3/4.11.3             | SOLID RADIOACTIVE WASTES  |
| 3/4.11.4             | RADIOACTIVE EFFLUENT: TOTAL DOSE  |
| 3/4.12.1             | RADIOLOGICAL ENVIRONMENTAL MONITORING: MONITORING PROGRAM                                       |
| 3/4.12.2             | RADIOLOGICAL ENVIRONMENTAL MONITORING: LAND USE CENSUS  |
| 3/4.12.3             | RADIOLOGICAL ENVIRONMENTAL MONITORING: INTERLABORATORY COMPARISON PROGRAM                       |

These procedural details that have been removed from the TS are not required by the Commission's regulations to be included in TS. They have been prepared for incorporation in the ODCM or PCP upon issuance of this license amendment and may be subsequently changed by the licensee without prior NRC approval.

The following specifications that are included under the heading of Radioactive Effluent have been retained in the TS. This is in accordance with the guidance of GL 89-01.

| <u>SPECIFICATION</u> | <u>TITLE</u>                         |
|----------------------|--------------------------------------|
| 3/4.11.1.4           | LIQUID EFFLUENT: LIQUID HOLDUP TANKS |
| 3/4.11.2.6           | EXPLOSIVE GAS MIXTURE                |
| 3/4.11.2.7           | MAIN CONDENSER                       |

Additionally, the licensee has proposed some editorial changes to support the

GL 89-01 changes. These changes include deletion of two tables and relocation of their requirements into the main body of the TS, addition of a reference to a TS, correction of a reference, and the deletion of references to deleted TS. These administrative changes are acceptable to the NRC staff. Additionally, the statement, "All gaseous releases at PNPP are considered to be ground-level releases" is being deleted from TS 5.1.1 because this information is included in the Updated Safety Analysis Report and the ODCM. This change is consistent with the intent of GL 89-01 and is acceptable to the NRC staff.

Also, the licensee proposed the deletion of four definitions, which are only applicable to the relocated procedural details of RETS. These changes are in accordance with NUREG-1434, "Improved BWR-6 Technical Specifications," which were previously approved by the NRC staff in license amendment No. 69, dated June 23, 1995. These changes were requested in order to make the radiological TS changes all at once, because license amendment No. 69 is not scheduled for implementation until following the upcoming refueling outage. These changes are acceptable to the NRC staff.

On the basis of the above, the NRC staff finds that the changes included in the proposed TS amendment request are consistent with the guidance provided in GL 89-01. Because the control of radioactive effluent continues to be limited in accordance with operating procedures that must satisfy the regulatory requirements of 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50, the NRC staff concludes that this change is administrative in nature and there is no impact on plant safety as a consequence. In addition, the proposed changes do not affect the Perry Improved TS issued on June 23, 1995, because RETS details are already removed from the Perry Improved TS. Accordingly, the NRC staff finds the proposed changes acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Ohio State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or a change to a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluent that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (60 FR 24921). Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

## 5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Hopkins

Date: September 15, 1995