OPERATING DATA REPORT
SUPPLEMENTAL INFORMATION

MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS

Design Change Package (DCP) 84/4074, Radwaste Transfer Lines from Liquid Radwaste to Vendor Connection Station.

A. Summary of 10 CFR 50.59 Considerations

The probability of an occurrence or the consequence of an accident or malfunction of equipment important to safety previously evaluated in the Final Safety Analysis Report will not be increased because: The design change as described below, does not affect any direct safety function or system important to safety, previously evaluated in the FSAR. Therefore, the probability of an occurrence or the consequence of a malfunction of equipment important to safety will not be increased. The postulated worst case failures (radwaste tank rupture and piping leaks) analyzed in FSAR sections 15.7.2 and 15.7.3 envelope the occurrence and consequence of postulated accidents due to this design change. Therefore, the probability of an occurrence or the consequence of an accident will not be increased.

The possibility for an accident or malfunction of a different type than those previously evaluated in the Final Safety Analysis Report will not be created because: All potentially radioactive portions of the transfer line system are located within the radwaste building and designs were developed in accordance with the related guidance in Branch Technical Position ETSB 11-1 of NRC Standard Review Plan 11.2. Therefore, use of the radwaste transfer line system will not result in releases which differ from those previously predicted in FSAR sections 15.7.2 and 15.7.3 nor will there be a change to the maximum exposure to an individual in the unrestricted area.

The margin of safety, as defined in the basis for the Technical Specifications will not be reduced because: The design change does not change the limiting conditions for operation, applicability, actions, or surveillance requirements as defined in the basis for Technical Specifications 3/4.11.1, 3/4.11.3, 6.12, 6.13, and 6.15.

B. Reason for Change

In an effort to develop an efficient and reliable system for processing radwaste at Grand Gulf Nuclear Station (GGNS), the liquid radwaste transfer lines, as described below, will provide the capability to install mobile/portable filtration equipment to facilitate maintenance outages, unusually large waste volumes, and emergency operations. The transfer lines will also provide testing capabilities for alternative state-of-the-art filtration equipment and future system enhancements.

C. Detailed Description of Change

This DCP requires modification of the existing liquid radwaste (G17) system at GGNS, such that process piping can be used for transferring liquid radwaste directly to a vendor filtration processing station located in the radwaste building rail/truck bay. Liquid waste can be transferred from the floor drain collector tank, the equipment drain collector tanks, and the waste surge tanks. The modifications can provide a permanent alternate filtration capability regardless of future modifications to the liquid radwaste system.

D. Response to GGNS Technical Specificaiton 6.15, (1.d), (1.e), (1.f), and (1.g).

Since this change involves only interface piping for transfer of liquid radwaste and does not impact waste processing capabilities (except to increase flexibility) or effluent releases, predicted releases of radioactive materials in liquid and gaseous effluents and/or solid waste quantities should not differ as a result of this change. Accordingly, expected maximum exposures to an individual in the unrestricted area and to the general population are also unaffected by this change. Since all of the transfer piping is contained within the radwaste building, any potential for radiological consequences due to spills is encompassed by the existing, and still limiting, tank failure analyses presented in the FSAR. Pipe routing is consistent with the design radiation zones and ALARA principles such that no additional exposure to plant operating personnel is anticipated as a result of this change.