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March 4, 1992

Docket Nos. 50-424
50-425

ELV-02347

TAC-M81673
M81674

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REQUEST FOR TECHNICAL SPECIFICATION CHANGES
RESPONSE TO GENERIC LETTER 89-01
RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATION CHANGES

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.59, Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant (VEGP) Units 1 and 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81.

The Technical Specification changes which are being requested will allow the implementation of programmatic controls for Radiological Effluent Technical Specifications (RETS) in the Administrative Controls section of the Technical Specifications and the relocation of procedural details of the RETS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP), as appropriate. This request has been prepared consistent with the guidance contained in Generic Letter 89-01 which encouraged licensee submittal of these Technical Specification changes. Such action simplifies the RETS, meets the regulatory requirements for radioactive effluents and radiological environmental monitoring, and implements a line-item improvement to the Technical Specifications, consistent with the Commission's Interim Policy Statement on Technical Specification Improvements. Georgia Power Company requests approval of the proposed amendment by September 1, 1992.

Enclosure 1 provides a description of the proposed changes and the basis for the change request.

Enclosure 2 provides the basis for a determination that the proposed changes do not involve significant hazards considerations.

Enclosure 3 provides a mark-up of the affected Technical Specification pages.

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Enclosure 4 provides a copy of the ODCM. The ODCM has been revised to include the procedural details contained in the current Technical Specifications regarding radioactive effluents and radiological environmental monitoring, and their associated reporting requirements.

Enclosure 5 provides a copy of the PCP. The PCP has been revised to include the procedural details contained in the current Technical Specifications regarding solid radioactive wastes, and their associated reporting requirements.

In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and the enclosures.

Mr. C. K. McCoy states that he is a Vice-President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company and that, to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

GEORGIA POWER COMPANY

By: CKM '9
C. K. McCoy

Sworn to and subscribed before me this 4th day of March, 1992.

Mary N. Bentley
Notary Public

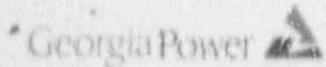
MY COMMISSION EXPIRES MAY 9, 1995

CKM/TMM/tmm

Enclosures

1. Basis for Proposed Changes
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation and Revised Pages
4. Offsite Dose Calculation Manual
5. Process Control Program

Distribution Attached



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cc: w/enclosures

Georgia Power Company
Mr. W. B. Shipman
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebner, Regional Administrator
Mr. J. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia
Mr. J. D. Tanner, Commissioner, Department of Natural Resources

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT
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BASIS FOR PROPOSED CHANGE

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT REQUEST FOR TECHNICAL SPECIFICATION CHANGES RESPONSE TO GENERIC LETTER 89-01 RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATION CHANGES

BASIS FOR PROPOSED CHANGE

Proposed Change

This proposed change to the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications will implement the recommendations contained in Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (RETS) in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP)." Editorial corrections are also being proposed, consistent with the RETS revisions.

Basis

This Technical Specification change request will (1) incorporate programmatic controls in the Administrative Controls section of the Technical Specifications that satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50, (2) relocate the existing procedural details in current specifications involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the Technical Specifications to the ODCM as appropriate, (3) relocate the definition of solidification and existing procedural details in the current specification on solid radioactive wastes to the PCP as appropriate, (4) simplify the associated reporting requirements, (5) simplify the administrative controls for changes to the ODCM and PCP, (6) add record retention requirements for changes to the ODCM and PCP, and (7) update the definitions of the ODCM and PCP consistent with these changes. All of the affected VEGP Technical Specifications and their disposition are specifically described in the table to this enclosure.

These proposed Technical Specification changes to the RETS conform to the guidance contained in Generic Letter 89-01. Such action will simplify the RETS, meet the regulatory requirements for radioactive effluents and radiological monitoring, and implement a line-item improvement to the Technical Specifications, consistent with the Commission's Interim Policy Statement on Technical Specification Improvements. Also, the changes to the ODCM (Enclosure 4) and the PCP (Enclosure 5) for relocating the procedural details of the RETS have been prepared in accordance with the proposed changes to the Administrative Controls section of the Technical Specifications so that they may be implemented immediately upon issuance of the proposed amendment.

ENCLOSURE 1 (CONTINUED)

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BASIS FOR PROPOSED CHANGE

As part of the effort to relocate procedural details from the RETS to the ODCM, a typographical error was discovered in Technical Specification Table 4.11-1 as explained in footnote (1) of the table to this enclosure concerning the composite lower limit of detection for continuous releases related to Sr-89 and Sr-90. This error was corrected when the Technical Specification requirements in Table 4.11-1 were relocated to the ODCM.

Finally, a correction is also being made to Technical Specification Figure 5.1-2 regarding deletion of the radwaste solidification building vent, which does not exist, and replacing it with the dry active waste processing building vent. The potential site locations for gaseous discharges, which includes the dry active waste processing building vent, are described in the ODCM and are consistent with the proposed changes to Figure 5.1-2.

TABLE TO ENCLOSURE 1 (SHEET 1 OF 4)

G.I. 89-01 STS REFERENCE	VOGTLE TECH SPEC REFERENCE	TITLE	DISPOSITION OF EXISTING VOGTLE TECHNICAL SPECIFICATIONS
1.17	1.19	OFFSITE DOSE CALCULATION MANUAL (ODCM)	Definition is updated to reflect the change in scope of the ODCM.
1.22	1.24	PROCESS CONTROL PROGRAM (PCP)	Definition is updated to reflect the change in scope of of the PCP.
1.32	1.33	SOLIDIFICATION	Definition is relocated to the PCP, Section 5.9.1.
3/4.3.3.10	3/4.3.3.9	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION	Programmatic controls are included in proposed Specification 6.7.4.f.1. Existing specification procedural details are relocated to the ODCM, Section 1.5.4.
3/4.3.3.11	3/4.3.3.10	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION <u>RENAMED</u> EXPLOSIVE GAS MONITORING INSTRUMENTATION	Programmatic controls are included in proposed Specification 6.7.4.f.1. Existing specification procedural details are relocated to the ODCM, Section 2.5.6. Existing requirements for explosive gas monitoring instrumentation have been retained.
3/4.11.1.1	3/4 11.1.1	LIQUID EFFLUENTS: CONCENTRA- TION	Programmatic controls are included in proposed Specifications 6.7.4.f.2 and 6.7.4.f.3. Existing specification procedural details are relocated to the ODCM, Section 1.5.1.(1)
3/4.11.1.2	3/4.11.1.2	LIQUID EFFLUENTS: DOSE	Programmatic controls are included in proposed Specifications 6.7.4.f.4 and 6.7.4.f.5. Existing specification procedural details are relocated to the ODCM, Section 1.5.2.
3/4.11.1.3	3/4.11.1.3	LIQUID EFFLUENTS: LIQUID RADWASTE TREATMENT SYSTEM	Programmatic controls are included in proposed Specification 6.7.4.f.6. Existing specification procedural details are relocated to the ODCM, Section 1.5.3.

TABLE TO ENCLOSURE 1 (SHEET 2 OF 4)

G.L. 89-01 STS REFERENCE	VOGTLE TECH SPEC REFERENCE	TITLE	DISPOSITION OF EXISTING VOGTLE TECHNICAL SPECIFICATIONS
3/4.11.1.4	3/4.11.1.4	LIQUID HOLDUP TANKS	Existing specification requirements have been retained.
3/4.11.2.1	3/4.11.2.1	GASEOUS EFFLUENTS: DOSE RATE	Programmatic controls are included in proposed Specifications 6.7.4.f.3 and 6.7.4.f.7. Existing specification procedural details are relocated to the ODCM, Section 2.5.1.
3/4.11.2.1	3/4.3.2	ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTA- TION TRIP SETPOINT	Table 3.3-3, note "c", is revised to delete the reference to Specification 3.11.2.1 and replace it with a reference to proposed Specification 6.7.4.f which contains the programmatic controls for radioactive effluents. The procedural details associated with Specification 3.11.2.1 have been relocated to ODCM, Section 2.5.1.
3/4.11.2.2	3/4.11.2.2	GASEOUS EFFLUENTS: DOSE - NOBLE GASES	Programmatic controls are included in proposed Specifications 6.7.4.f.5 and 6.7.4.f.8. Existing specification procedural details are relocated to the ODCM, Section 2.5.2.
3/4.11.2.3	3/4.11.2.3	GASEOUS EFFLUENTS: DOSE - IODINE-131, IODINE-133, TRI- TIUM, AND RADIOACTIVE MATERIAL IN PARTICULATE FORM	Programmatic controls are included in proposed Specifications 6.7.4.f.5 and 6.7.4.f.9. Existing specification procedural details are relocated to the ODCM, Section 2.5.3.
3/4.11.2.4	3/4.11.2.4	GASEOUS EFFLUENTS: GASEOUS RADWASTE TREATMENT SYSTEM	Programmatic controls are included in proposed Specification 6.7.4.f.6. Existing specification procedural details are relocated to the ODCM, Section 2.5.4.
3/4.11.3	3/4.11.3	SOLID RADIOACTIVE WASTES	Existing specification procedural details are relocated to the PCP, Section 10.0.

TABLE TO ENCLOSURE 1 (SHEET 3 OF 4)

G.L. 89-01 STS REFERENCE	VOGTLE TECH SPEC REFERENCE	TITLE	DISPOSITION OF EXISTING VOGTLE TECHNICAL SPECIFICATIONS
3/4.11.4	3/4.11.4	RADIOACTIVE EFFLUENTS: TOTAL DOSE	Programmatic controls are included in proposed Specification 6.7.4.f.10. Existing specification procedural details are relocated to the ODCM, Section 2.5.5.
3/4.12.1	3/4.12.1	RADIOLOGICAL ENVIRONMENTAL MONITORING: MONITORING PROGRAM	Programmatic controls are included in proposed Specification 6.7.4.g.1. Existing specification procedural details are relocated to the ODCM, Section 3.1.1.
3/4.12.2	3/4.12.2	RADIOLOGICAL ENVIRONMENTAL MONITORING: LAND USE CENSUS	Programmatic controls are included in proposed Specification 6.7.4.g.2. Existing specification procedural details are relocated to the ODCM, Section 3.1.2.
3/4.12.3	3/4.12.3	RADIOLOGICAL ENVIRONMENTAL MONITORING: INTERLABORATORY COMPARISON PROGRAM	Programmatic controls are included in proposed Specification 6.7.4.g.3. Existing specification procedural details are relocated to the ODCM, Section 3.2.
--	Figure 5.1-2	EFFLUENT RELEASE POINTS	Figure 5.1-2 is revised to correctly identify the effluent release points from the site by deleting the radwaste solidification building vent and adding the dry active waste processing building vent. Programmatic controls for the dry active waste processing building vent are defined in proposed Specification 6.7.4.f. Procedural details are included in the ODCM and the PCP.
6.8.4.g	6.7.4.f	PROCEDURES AND PROGRAMS	Programmatic controls for radioactive effluents are defined in proposed Specification 6.7.4.f.
6.8.4.h	6.7.4.g	PROCEDURES AND PROGRAMS	Programmatic controls for radiological environmental monitoring are defined in proposed Specification 6.7.4.g.

TABLE TO ENCLOSURE 1 (SHEET 4 OF 4)

G.L. 89-01 STS REFERENCE	VOGTLE TECH SPEC REFERENCE	TITLE	DISPOSITION OF EXISTING VOGTLE TECHNICAL SPECIFICATIONS
6.9.1.3	6.8.1.3	REPORTING REQUIREMENTS: ANNUAL RADIOLOGICAL ENVIRONMENTAL SURVEILLANCE REPORT	Specification 6.8.1.3 is simplified and existing reporting details are relocated to the ODCM, Section 6.1.
6.9.1.4	6.8.1.4	REPORTING REQUIREMENTS: SEMI- ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT	Specification 6.8.1.4 is simplified and existing reporting details are relocated to the ODCM, Section 6.2.
6.10.3	6.9.3	RECORD RETENTION	Record retention requirements are included in proposed Specification 6.9.3.o.
6.13.2	6.12.2	PROCESS CONTROL PROGRAM (PCP)	Specification 6.12.2 requirements are simplified.
6.14.2	6.13.2	OFFSITE DOSE CALCULATION MANUAL (ODCM)	Specification 6.13.2 requirements are simplified.
6.15.1	6.14.1	MAJOR CHANGES TO LIQUID, GASEOUS, AND SOLID RADWASTE TREATMENT SYSTEMS	Existing specification procedural details are relocated to the ODCM, Section 6.2.7.

- (1) Table 4.11-1, Item 2.a, of the Technical Specifications contained a typographical error which was corrected when relocated to the ODCM. The composite lower limit of detection for continuous releases related to Sr-89 and Sr-90 is listed as 1×10^{-8} microcurie/ml instead of 5×10^{-8} microcurie/ml. This change will provide consistency with the value of 5×10^{-8} microcurie/ml listed for Sr-89 and Sr-90 for batch waste releases listed in the Vogtle Technical Specifications, Table 4.11-1, Item 1.c, and in the Standard Technical Specifications.

ENCLOSURE 2

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10 CFR 50.92 EVALUATION

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT REQUEST FOR TECHNICAL SPECIFICATION CHANGES RESPONSE TO GENERIC LETTER 89-01 RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATION CHANGES

10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, Georgia Power Company (GPC) has evaluated the attached proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve significant hazards considerations.

Background

By letter dated January 31, 1989, the Nuclear Regulatory Commission (NRC) issued Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (RETS) in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP)," and encouraged licensees to propose changes to their Technical Specifications consistent with the guidance contained therein. Accordingly, GPC has prepared this proposed amendment request consistent with the guidance contained in Generic Letter 89-01.

Analysis

This proposed amendment request adds new programmatic requirements governing radioactive effluents and radiological environmental monitoring to the Administrative Controls section of the Technical Specifications. The existing RETS, containing procedural details on radioactive effluents, solid radioactive wastes, environmental monitoring, and associated reporting requirements, are being relocated to the ODCM or the PCP as appropriate. The details concerning these changes are discussed in Enclosure 1.

The level of radiological control will not be reduced by these changes to the RETS since compliance with applicable regulatory requirements governing radioactive effluents and radiological environmental monitoring, including 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 will continue to be maintained. Therefore, this proposed amendment request will provide programmatic controls for RETS consistent with regulatory requirements and will allow the relocation of procedural details of the RETS to the ODCM or PCP as appropriate. Accordingly, future changes to these procedural details will be subject to the controls for changes to the ODCM or PCP included in the Administrative Controls section of the Technical Specifications. These procedural details are not required to be included in the Technical Specifications by 10 CFR 50.36a.

ENCLOSURE 2 (CONTINUED)

VOGTLE ELECTRIC GENERATING PLANT REQUEST FOR TECHNICAL SPECIFICATION CHANGES RESPONSE TO GENERIC LETTER 89-01 RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATION CHANGES

10 CFR 50.92 EVALUATION

An additional change to the Technical Specifications is being proposed to correct a typographical error in Table 4.11-1 pertaining to the radioactive liquid waste sampling and analysis program. The composite lower limit of detection for continuous releases related to Sr-89 and Sr-90 is incorrectly listed in Table 4.11-1, Item 2.a, as 1×10^{-8} microcurie/ml and is being changed to 5×10^{-8} . This change will provide consistency with the value of 5×10^{-8} microcurie/ml listed in Table 4.11-1, Item 1.c, for Sr-89 and Sr-90. This change is also consistent with the values listed in the Standard Technical Specifications.

A change to Technical Specification Figure 5.1-2 is also being proposed to delete the radwaste solidification building vent, which does not exist, and replacing it with the dry active waste processing building vent. The potential site locations for gaseous discharges, which includes the dry active waste processing building vent, are described in the ODCM and are consistent with the proposed changes to Figure 5.1-2.

Conclusion

Based on the above considerations GPC has concluded the following concerning the requirements of 10 CFR 50.92.

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated for the following reasons:

The proposed changes to the RETS are administrative in nature and alter only the format and location of programmatic controls and procedural details relative to radioactive effluents, solid radioactive waste, radiological environmental monitoring, and associated reporting requirements. Compliance with applicable regulatory requirements will continue to be maintained. In addition, the proposed changes do not alter the conditions or assumptions in any of the accident analyses. Since the accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes.

The proposed change to Table 4.11-1 corrects a typographical error in order to provide consistency regarding the composite lower limit of detection for continuous releases related to Sr-89 and Sr-90. The effectiveness of the radioactive liquid waste sampling and analysis program is not reduced by this proposed change.

ENCLOSURE 2 (CONTINUED)

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10 CFR 50.92 EVALUATION

The proposed change to Figure 5.1-2 revises the location of effluent release points by correctly designating the dry active waste processing building vent instead of the radwaste solidification building vent. The accident analyses remain bounding and the radiological consequences previously evaluated are not adversely affected by the proposed change.

Therefore, it can be concluded that these proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated for the following reasons:

The proposed changes to the RETS do not involve any change to the configuration or method of operation of any plant equipment. Accordingly, no new failure modes have been defined for any plant system or component important to safety nor has any new limiting single failure been identified as a result of the proposed changes. Also, there will be no change in types or increase in the amounts of any effluents released offsite.

The proposed change to Table 4.11-1 is administrative in nature and does not involve any change to the configuration or method of operation of any plant equipment.

The proposed change to Figure 5.1-2 correctly identifies the effluent release points from the site. No new failure modes or limiting single failures are introduced as a result of this proposed change.

Therefore, it can be concluded that these proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed changes do not involve a significant reduction in a margin of safety for the following reasons:

The proposed changes to the RETS do not involve any actual change in the methodology used in the control of radioactive effluents, solid radioactive wastes, or radiological environmental monitoring. These

ENCLOSURE 2 (CONTINUED)

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10 CFR 50.92 EVALUATION

changes provide for the relocation of procedural details outside of the Technical Specifications but add appropriate administrative controls to provide continued assurance of compliance with applicable regulatory requirements. These proposed changes also comply with the guidance contained in Generic Letter 89-01.

The proposed change to Table 4.11-1 is an administrative change that has no safety impact and is consistent with the applicable requirements contained in the Standard Technical Specifications.

The proposed change to Figure 5.1-2 correctly identifies the effluent release points from the site. The programmatic controls which are being proposed as part of the RETS changes and the procedural details that are being relocated to the ODCM and the PCP will provide assurance that there will be no adverse impact on the safe operation of the plant as a result of this change.

Therefore, it can be concluded that the proposed changes do not involve a significant reduction in a margin of safety.

Based on the preceding analysis, GPC has been determined that the proposed revisions to the Technical Specifications do not involve a significant hazards consideration as defined by 10 CFR 50.92 (c).