

SUPPLEMENT to LICENSE AMENDMENT REQUEST
Dated July 17, 1995

Radiological Effluent Technical Specification Conformance
To Standard Technical Specifications and Generic Letter 89-01

ATTACHMENT 1

Appendix A, Technical Specifications Marked Up Pages

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1. a. Pursuant to 10CFR20, paragraph 20.1601(c), in lieu of the requirements of 10CFR20.1601, each high radiation area, as defined in 10CFR20, 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 (RWP). Individuals qualified in radiation protection procedures (e.g., health physics technicians) 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 less than or equal to 1000 mrem/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:

- (1) A radiation monitoring device that continuously indicates the radiation dose rate in the area.
- (2) A radiation monitoring device that 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 are aware of them.
- (3) 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 by the radiation protection manager.

- b. In addition to the requirements of Specification 6.5.B.1.a above, areas with radiation levels greater than or equal to 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Supervisor on duty or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP that shall specify the dose rate levels in the immediate work areas and the maximum allowable stay times for individuals in those areas. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV or transmitting radiation monitoring device) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

c. For individual high radiation areas with radiation levels of greater than 1000 mrem/hr, accessible to personnel, that are located within large areas such as reactor containment, where no enclosure exists for purposes of locking, or that cannot be continuously guarded, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded and conspicuously posted, and a flashing light shall be activated as a warning device.

~~1. a. Paragraph 20.203 "Caution signs, labels, signals and controls" In lieu of the "Control device" or alarm signal required by paragraph 20.203(e) (2), each high radiation area in which the intensity of radiation is 1000 mRem/hr or less 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 (or continuous escort by a qualified person for the purpose of making a radiation survey) and any individual or group of individuals permitted to enter such area shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.~~

~~b. The above procedure shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr, except that doors shall be locked or attended to prevent unauthorized entry into these areas and the keys or key devices for locked doors shall be maintained under the administrative control of the Plant Manager.~~

2. A program shall be implemented to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:
 - a. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
 - b. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals

A program acceptable to the Commission was described in letters from L.O. Mayer, NSP, to Director of Nuclear Reactor Regulation, dated December 31, 1979 "Lessons Learned implementation" and March 13, 1980, "1/1/80 Lessons Learned Implementation Additional Information".

3. A program shall be implemented which will ensure the capability to accurately determine the airborne iodine concentration in essential plant areas under accident conditions. This program shall include the following:

~~the Annual Radioactive Effluent Report for the period in which the change(s) were 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 product to existing criteria for solid wastes; and~~
 - ~~c. documentation of the fact that the change has been reviewed and found acceptable by the Operations Committee.~~
- ~~2. Shall become effective upon review and acceptance by the Operations Committee.~~

E. Offsite Dose Calculation Manual (ODCM)

The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Monitoring, and Radioactive Effluent Reports required by Specification 6.7.C.1 and Specification 6.7.A.4.

~~The ODCM shall be approved by the Commission prior to initial implementation. Changes to the ODCM shall satisfy the following requirements:~~

- 1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),
 - b. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations;

~~Shall be submitted to the Commission with the Annual Radioactive Effluent Report for the period in which the change(s) were made effective. This submittal shall contain:~~

- ~~a. sufficiently detailed information to totally support the rationale~~

radioactive effluents as low as reasonably achievable.

This program shall allocate releases equally to each unit. The liquid radwaste treatment system, waste gas treatment system, containment purge release vent, and spent fuel pool vent are shared by both units. Experience has also shown that contributions from both units are released from each auxiliary building vent. Therefore, all releases will be allocated equally in determining conformance to the design objectives of 10CFR50, Appendix I.

The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

1. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
2. Limitation on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to Appendix B to 10CFR20.1 - 20.601, Table II, Column 2;
3. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10CFR20.1302 and with the methodology and parameters in the ODCM;
4. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10CFR50, Appendix I;
5. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least monthly;
6. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of one month from the liquid effluent releases would exceed 0.12 mrem to the total body or 0.4 mrem to any organ; or from the gaseous effluent releases would exceed 0.4 mrad for gamma air dose, 0.8 mrad for beta air dose, or 0.6 mrem organ dose;
7. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the dose associated with Appendix B to 10CFR20.1 - 20.601, Table II, Column 1;

8. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10CFR50, Appendix I;
9. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10CFR50, Appendix I; and
10. Limitation on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40CFR190.

I. Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the waste gas holdup system, the quantity of radioactivity contained in gas storage tanks, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks.

The program shall include:

1. The limits for concentration of oxygen in the waste gas holdup system and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria;
2. A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank is less than or equal to 78,000 curies of noble gases (considered as dose equivalent Xe-133); and
3. A surveillance program to ensure that the quantity of radioactivity contained in each of the following tanks shall be limited to 10 curies, excluding tritium and dissolved or entrained noble gases:
 - Condensate storage tanks
 - Outside temporary tanks
4. The provisions of TS 4.0 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

C. Environmental Reports

The reports listed below shall be submitted to the Administrator of the appropriate Regional NRC Office or his designate:

1. Annual Radiological Environmental Monitoring Report

The Annual Radiological Environmental Monitoring Report covering the operation of the plant during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10CFR50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

- ~~(a) Annual Radiation Environmental Monitoring Reports covering the operation of the program during the previous calendar year shall be submitted prior to May 1 of each year.~~
- ~~(b) The Annual Radiation Environmental Monitoring Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous environmental surveillance reports and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 4.10.B.1. If harmful effects or evidence of irreversible damage are detected by the monitoring, the report shall provide an analysis of the problem and a planned course of action to alleviate the problem.~~
- ~~(c) The Annual Radiation Environmental Monitoring Reports shall include summarized and tabulated results in the format of Regulatory Guide 4.8, December 1975 of all radiological environmental samples taken during the report period. In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.~~
- ~~(d) The reports shall also include the following: a summary description of the radiological environmental monitoring program; a map of all sampling locations keyed to a table giving distances and directions from one reactor; and the results of licensees participation in the Interlaboratory Comparison Program defined in the ODCM, required by Specification 4.10.C.1.~~

2. Deleted Environmental Special Reports

- ~~(a) When radioactivity levels in samples exceed limits specified in Table 4.10-3, an Environmental Special Report shall be submitted within 30-~~

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ATTACHMENT 2

Appendix A, Technical Specifications Revised Pages

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1. a. Pursuant to 10CFR20, paragraph 20.1601(c), in lieu of the requirements of 10CFR20.1601, each high radiation area, as defined in 10CFR20, 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 (RWP). Individuals qualified in radiation protection procedures (e.g., health physics technicians) 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 less than or equal to 1000 mrem/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:

- (1) A radiation monitoring device that continuously indicates the radiation dose rate in the area.
 - (2) A radiation monitoring device that 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 are aware of them.
 - (3) 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 by the radiation protection manager.
- b. In addition to the requirements of Specification 6.5.B.1.a above, areas with radiation levels greater than or equal to 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Supervisor on duty or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP that shall specify the dose rate levels in the immediate work areas and the maximum allowable stay

times for individuals in those areas. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV or transmitting radiation monitoring device) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

- c. For individual high radiation areas with radiation levels of greater than 1000 mrem/hr, accessible to personnel, that are located within large areas such as reactor containment, where no enclosure exists for purposes of locking, or that cannot be continuously guarded, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded and conspicuously posted, and a flashing light shall be activated as a warning device.
2. A program shall be implemented to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:
 - a. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
 - b. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals

A program acceptable to the Commission was described in letters from L.O.Mayer, NSP, to Director of Nuclear Reactor Regulation, dated December 31, 1979 "Lessons Learned implementation" and March 13, 1980, "1/1/80 Lessons Learned Implementation Additional Information".

3. A program shall be implemented which will ensure the capability to accurately determine the airborne iodine concentration in essential plant areas under accident conditions. This program shall include the following:
 - a. Training of personnel,
 - b. Procedures for monitoring, and
 - c. Provisions for maintenance of sampling and analysis equipment

A program acceptable to the Commission was described in letters from L.O.Mayer, NSP, to Director of Nuclear Reactor Regulation, dated December 31, 1979 "Lessons Learned Implementation" and March 13, 1980, "1/1/80 Lessons Learned Implementation Additional Information".

Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),
 - b. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations;
2. Shall become effective after approval by a member of plant management designated by the Plant Manager.
3. Shall be submitted to the NRC in the form of a complete legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed. The date (i.e., month and year) the change was implemented shall be indicated.

F. Security

Procedures shall be developed to implement the requirements of the Security Plan and the Security Contingency Plan. These implementing procedures, with the exception of those non-safety related procedures which govern work activities exclusively applicable to or performed by security personnel, shall be reviewed by the Operations Committee and approved by a member of plant management designated by the Plant Manager. Security procedures not reviewed by the Operations Committee shall be reviewed and approved by the Superintendent Security.

G. Temporary Changes to Procedures

Temporary changes to Operations Committee reviewed procedures described in A,B,C,D,E and F above, which do not change the intent of the original procedure may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Reactor Operator License. Such changes shall be documented, reviewed by the Operations Committee and approved by a member of plant management designated by the Plant Manager within one month. Temporary changes to security procedures not reviewed by the Operations Committee shall be reviewed by two (2) individuals knowledgeable in the area affected by the procedure.

H. Radioactive Effluent Controls Program

This program conforms to 10CFR50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable.

This program shall allocate releases equally to each unit. The liquid radwaste treatment system, waste gas treatment system, containment purge release vent, and spent fuel pool vent are shared by both units. Experience has also shown that contributions from both units are released from each auxiliary building vent. Therefore, all releases will be allocated equally in determining conformance to the design objectives of 10CFR50, Appendix I.

The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

1. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
2. Limitation on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to Appendix B to 10CFR20.1 - 20.601, Table II, Column 2;
3. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10CFR20.1302 and with the methodology and parameters in the ODCM;
4. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10CFR50, Appendix I;
5. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least monthly;
6. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of one month from the liquid effluent releases would exceed 0.12 mrem to the total body or 0.4 mrem to any organ; or from the gaseous effluent releases would exceed 0.4 mrad for gamma air dose, 0.8 mrad for beta air dose, or 0.6 mrem organ dose;

7. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the dose associated with Appendix B to 10CFR20.1 - 20.601, Table II, Column 1;
8. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10CFR50, Appendix I;
9. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10CFR50, Appendix I; and
10. Limitation on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40CFR190.

I. Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the waste gas holdup system, the quantity of radioactivity contained in gas storage tanks, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks.

The program shall include:

1. The limits for concentration of oxygen in the waste gas holdup system and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria;
2. A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank is less than or equal to 78,000 curies of noble gases (considered as dose equivalent Xe-133); and
3. A surveillance program to ensure that the quantity of radioactivity contained in each of the following tanks shall be limited to 10 curies, excluding tritium and dissolved or entrained noble gases:
 - Condensate storage tanks
 - Outside temporary tanks
4. The provisions of TS 4.0 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

C. Environmental Reports

The reports listed below shall be submitted to the Administrator of the appropriate Regional NRC Office or his designate:

1. Annual Radiological Environmental Monitoring Report

The Annual Radiological Environmental Monitoring Report covering the operation of the plant during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10CFR50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiation Environmental Monitoring Reports shall include summarized and tabulated results in the format of Regulatory Guide 4.8, December 1975 of all radiological environmental samples taken during the report period. In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; a map of all sampling locations keyed to a table giving distances and directions from one reactor; and the results of licensees participation in the Interlaboratory Comparison Program defined in the ODCM.

2. Deleted

3. Other Environmental Reports (non-radiological, non-aquatic)

Written reports for the following items shall be submitted to the appropriate NRC Regional Administrator:

- a. Environmental events that indicate or could result in a significant environmental impact casually related to plant operation. The following are examples: excessive bird impaction; onsite plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; or increase in nuisance organisms or conditions. This report shall be submitted within 30 days of the event and shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition

of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

- b. Proposed changes, test or experiments which may result in a significant increase in any adverse environmental impact which was not previously reviewed or evaluated in the Final Environmental Statement or supplements thereto. This report shall include an evaluation of the environmental impact of the proposed activity and shall be submitted 30 days prior to implementing the proposed change, test or experiment.

D. Special Reports

Unless otherwise indicated, special reports required by the Technical Specifications shall be submitted to the appropriate NRC Regional Administrator within the time period specified for each report.