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Letter #: HF:92:0473

Date: April 24, 1992

Subject: Controlled Distribution of Revisions to the Operational Safety Requirements/Technical Requirements, Volume VI

To: Distribution

cc: Original, MS-50B

Attached are the following revisions to the Operational Safety Requirements/Technical Requirements, Volume VI, which has been assigned to you under controlled distribution:

- Latest Index
- OSR/GP-1, Rev. 3 - "WVDP Airborne Radioactive Release Limits"
- OSR/GP-2, Rev. 2 - "Radioactivity Content of Liquid Effluents Released from WVDP"

Destroy or mark superseded the current Index; OSR/GP-1, Rev. 2; and OSR/GP-2, Rev. 1, and place the attached copies in your controlled manual accordingly.

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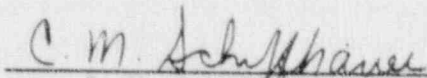
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B. E. Lindbergh, Records Processor
Records Management
West Valley Nuclear Services Co., Inc.

BEL

Approved: 
C. M. Schiffhauer, Manager

Attachment: As stated above

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OPERATIONAL SAFETY REQUIREMENTS/TECHNICAL REQUIREMENTS
WEST VALLEY DEMONSTRATION PROJECT

<u>WVDP Identifier</u>	<u>Rev.</u>	<u>Title/Contents</u>	<u>Former WVDP, NFS Identifiers</u>
OSR/GP-1	3	WVDP Airborne Radioactive Release Limits	M.11.5.2.4. WVDP 4.1 OSR GP-1 OSR/TR-GP-1
OSR/GP-2	2	Radioactivity Content of Liquid Effluents Released from WVDP	M.11.5.2.5. WVDP 4.2 OSR-GP-2 OSR/TR-GP-2
OSR/GP-3	4	Building and Vessel Ventilation Systems Operability	M.11.5.2.1. NFS 5.3, STS 1.1, 1.2, CSS 4.1, 4.2, SRF 8.2, LWTS 5.1 M.11.5.2.7. WVDP 4.14 LWTS 5.2, NFS 6.5, STS 1.2, CSS 4.2 M.11.5.2.8. TVS 3.0 M.11.5.2.1 VF 2.2, 2.3 OSR GP-3 OSR/TR-GP-3
OSR/GP-4	2	Effluent and Environmental Monitoring	M.11.5.2.1.B.X (WVDP 5.1) OSR GP-4 OSR/TR-GP-4

<u>WVDP Identifier</u>	<u>Rev.</u>	<u>Title/Contents</u>	<u>Former WVDP, NFS Identifiers</u>
OSR/GP-5	3	WVDP Emergency Power Requirements	M.11.5.4.3. NFS 6.4 M.11.5.2.1.D STS 1.3 M.11.5.2.1.G CSS 4.4 OSR GP-5 OSR/TR-GP-5
TR/GP-6	2	Storage Requirements for Low-Level Waste	M.11.5.2.1.J LAG-1, LAG-2 M.11.5.2.1.I SRF 8.4 TR-GP-6 OSR/TR-GP-6
OSR/GP-7	2	Criticality Safety for Liquid Transfer	M.11.5.2.2. WVDP 4.3 OSR GP-7 OSR/TR-GP-7
TR/GP-8	2	Water Activity Alarms	M.11.5.4.1. NFS 6.9 TR GP-8 OSR/TR-GP-8
TR/GP-9	2	Control of Plant Equipment Function and Configuration	New R GP-9 OSR/TR-GP-9
OSR/GP-10	2	Airborne Effluent Monitoring System Operability	M.11.5.4.4. NFS 6.5 STS 1.1, 1.2 CSS 4.1 OSR GP-10 OSR/TR-GP-10
OSR/GP-11	3	Storage Canister Loading and Spacing	M.11.5.1.2.B AFM 6.0 STS 1.4, CSS 4.3, LWTS 5.3 OSR GP-11 OSR/TR-GP-11

<u>WVDP Identifier</u>	<u>Rev.</u>	<u>Title/Contents</u>	<u>Former WVDP, NFS Identifiers</u>
OSR/GP-12	2	Fissile Material Limits and Requirements for Waste Packages	M.11.5.1.1.B CPCRIT 9.1, 9.3, STS 1.4, TRU 9.1, 9.2, LAG-1, LAG-2 M.11.5.1.1.J RER 1.1 M.11.5.4.1.J RER 1.3 M.11.5.6.1.J RER 1.2 OSR GP-12 OSR/TR-GP-12
TR-GP-13	1	Evacuation Alarm and Emergency Paging System Operability	New TR GP-13 OSR/TR-GP-13
TR-GP-14	1	WVDP Meteorological System Operability	New TR GP-14 OSR/TR-GP-14
TR-GP-15	1	Fire Brigade and Emergency Response Team Training	New TR GP-15 OSR/TR-GP-15
TR/GP-16	2	Plant Fire Protection Systems	New TR GP-16 OSR/TR-GP-16
OSR/GP-17	0	TN-BRP and TN-REG Shipping Cask Lid Installation	New
OSR/GP-18	0	Type B Shipping Cask License Compliance Documentation	New
TR/GP-19	0	Area Radiation Detector Requirements During Cask Fuel Loading	New

<u>WVDP Identifier</u>	<u>Rev.</u>	<u>Title/Contents</u>	<u>Former WVDP, NFS Identifiers</u>
OSR/IRTS-1	3	Maintenance of Carbon Steel High-Level Waste Tank Integrity	M.11.5.2.6. NFS 4.12 M.11.5.4.2. NFS 6.3 OSR IRTS-1 OSR/TR-IRTS-1
TR/IRTS-2	3	Control of USS Recipe for Decontaminated Supernatant	M.11.5.2.2.G CSS 4.3 TR IRTS-2 OSR/TR-IRTS-2
OSR/IRTS-3	3	Maintenance of Spare HLW Storage Capacity	M.11.5.2.3. NFS 5.4 OSR IRTS-3 OSR/TR-IRTS-3
TR/IRTS-4	4	Depressurization of STS for Maintenance	M.11.5.6.1.D TR IRTS-4 OSR/TR-IRTS-4
TR/IRTS-5	7	STS Process Limits	M.11.5.1.1.D STS 1.4 TR IRTS-5 OSR/TR-IRTS-5
TR-IRTS-6	2	LWTS Manifold Control - CANCELLED	New TR IRTS-6 OSR/TR-IRTS-6
TR-IRTS-7	5	Sampling and Analysis Requirements for Tank 5D-15B	New M.11.5.1.1.H LWTS 5.3 TR IRTS-7 OSR/TR-IRTS-7
TR/IRTS-8	4	Sampling and Analysis Requirements for Tanks 5-D-15 A1 and A2.	New TR IRTS-8 OSR/TR-IRTS-8

<u>WVDP Identifier</u>	<u>Rev.</u>	<u>Title/Contents</u>	<u>Former WVDP, NFS Identifiers</u>
OSR-IRTS-10	0	Criticality Control During Processing of High Level Waste Through Ion Exchange Columns Containing Ti-Treated Zeolite	New
TR-IRTS-11	0	Fissile Material Mass Balance Across the LWTS Evaporator	New

Doc. Number OSR/GP-1

Revision Number 3

Revision Date 04/24/92

Engineering Release #1430

Per ECN #3353

Per ECN #3900

West Valley Demonstration Project

OPERATIONAL SAFETY REQUIREMENTS

PREPARED BY	<u>D. R. Staffes</u> Cognizant Engineer	O. R. Staffes	Date	<u>5/20/88</u>
APPROVED BY	<u>C. J. Roberts</u> Cognizant Manager	C. J. Roberts	Date	<u>5/20/88</u>
APPROVED BY	<u>R. A. Humphrey</u> Radiation & Safety Committee, Chairman	R. A. Humphrey	Date	<u>5/24/88</u>
APPROVED BY	<u>D. L. Shugart</u> Quality Assurance	D. L. Shugart	Date	<u>5/20/88</u>
APPROVED BY	<u>R. F. Cassner</u> WV Treatment Project	R. F. Cassner	Date	<u>5/23/88</u>
APPROVED BY	<u>J. L. Knabenschun</u> Radiological & Environmental Safety Manager	J. L. Knabenschun	Date	<u>5/20/88</u>
APPROVED BY	<u>R. E. Lawrence, Jr.</u> Supernatant Treatment Project Manager	R. E. Lawrence, Jr.	Date	<u>1/2/89</u>



West Valley Nuclear Services Co.

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OSR:0001274.RM

WV-1816

DOE Approved: DW:92:0397
Dated 03/17/92

RECORD OF REVISION

PROCEDURE

If there are changes to the procedure, the revision number increases by one. These changes are indicated in the left margin of the body by an arrow (>) at the beginning of the paragraph that contains a change.

Example:

> The arrow in the margin indicates a change.

<u>Rev. No.</u>	<u>Description of Changes</u>	<u>Revision On Page(s)</u>	<u>Dated</u>
0	Original Issue	All	
1	Dated 5/20/88	All	
1	Engineering Release 1430	N/A	8/88
2	Per ECN 3353	Page 4	1/90
3	Complete Revision Per ECN 3902	All	04/24/92

RECORD OF REVISION (CONTINUATION SHEET)

<u>Rev. No.</u>	<u>Description of Changes</u>	<u>Revision On Page/s)</u>	<u>Dated</u>
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OPERATIONAL SAFETY REQUIREMENT OSR/GP-1

TITLE: WVDP Airborne Radioactive Release Limits

CRITERIA: 1. Release of airborne radioactive effluents shall not exceed limits established by DOE orders.

UNACCEPTABLE EVENTS: 1. Releases of airborne radioactivity exceeding DOE limits.

REPORTING REQUIREMENTS: For Operational Safety Requirement (OSR) violations, WV-987 "Initial Investigation, Oral Reporting, and Written Critique of Occurrences at WVNS" shall be followed.

Operational Safety Requirement OSR/GP-1	Page
Safety Limit	1
Limiting Conditions for Operation (LCOs)	1
Surveillance Requirements (SRs)	2
Basis	2
Attachments	3
References	3

IMPLEMENTING PROCEDURES:

- EM-11
- EM-101
- SOP 15-11
- SOP 15-48
- SOP 50-35
- SOP 70-30
- SOP 80-5
- SOP 80-6

OPERATIONAL SAFETY REQUIREMENT

WVDP AIRBORNE RADIOACTIVITY RELEASE LIMITS

APPLICABILITY

This OSR applies to all airborne radioactive emissions from WVDP permitted process and ventilation stacks.

OBJECTIVE

This specification ensures that the off-site doses from airborne radioactive releases from WVDP operations are less than the guideline values stipulated by DOE Order 5400.5, and 40 CFR 61, for individuals in uncontrolled (off-site) areas.

SPECIFICATION

SAFETY LIMIT

OFF-SITE RADIATION DOSE TO THE MAXIMALLY EXPOSED INDIVIDUAL BY THE AIRBORNE PATHWAY SHALL BE LESS THAN 10 MREM/YEAR EFFECTIVE DOSE EQUIVALENT.

1. LIMITING CONDITIONS FOR OPERATION

- A. THE TOTAL PARTICULATE RADIOACTIVITY RELEASE RATE FROM THE WVDP MAIN PLANT STACK SHALL NOT EXCEED 18 NANOCURIES/SECOND FOR LONG-LIVED GROSS BETA ACTIVITY AND 0.18 NANOCURIES/SECOND FOR LONG-LIVED GROSS ALPHA ACTIVITY AVERAGED OVER A CALENDAR QUARTER.
- B. THE TOTAL PARTICULATE RADIOACTIVITY RELEASE FROM EACH OF THE OTHER STACKS AND ANY FUTURE VENTS OR STACKS FOR WHICH MONITORING IS OR WILL BE REQUIRED (UP TO A TOTAL OF NINE STACKS), SHALL NOT EXCEED 3 NANOCURIES/SECOND/STACK FOR LONG-LIVED GROSS BETA ACTIVITY AND 0.03 NANOCURIES/SECOND/STACK FOR LONG-LIVED GROSS ALPHA ACTIVITY AVERAGED OVER A CALENDAR QUARTER.

2. SURVEILLANCE REQUIREMENT

- A. THE TOTAL PARTICULATE RADIOACTIVITY RELEASED FROM THE WVDP MAIN PLANT STACK SHALL BE MEASURED TO ENSURE THAT THE AVERAGE AIRBORNE

B. THE TOTAL PARTICULATE RADIOACTIVITY RELEASED FROM ALL OTHER STACKS FOR WHICH MONITORING IS REQUIRED SHALL BE MEASURED TO ENSURE THAT THE AVERAGE AIRBORNE RADIOACTIVITY RELEASED DOES NOT EXCEED 7.8 MILLICURIES/STACK GROSS BETA ACTIVITY OR 0.078 MILLICURE/STACK GROSS ALPHA ACTIVITY IN ANY ONE MONTH.

3. RECOVERY

IF THE RELEASE RATES SPECIFIED IN THE SURVEILLANCE REQUIREMENT ARE EXCEEDED, OPERATIONS SHALL BE CURTAILED AND CONDITIONS EVALUATED AND CORRECTED TO ASSURE THAT THE QUARTERLY LIMITS CAN BE MET BEFORE FURTHER OPERATIONS ARE PERMITTED.

BASIS

Per DOE Order 5400.5 and 40 CFR 61 Subpart H, the committed effective dose equivalent (EDE) from all stack effluents is limited to 10 mrem/year to any off-site resident, with an administrative surveillance level set at 1/12 of 10 percent of this limit per month for each stack or vent requiring monitoring. The straight line gaussian plume dispersion model, the terrestrial food-chain pathway models in NRC's Regulatory Guide 1.109, and external and internal dose factors (using the ICRP's organ weighted risk model), are incorporated in the computer model required by 40 CFR 61. This model forms the calculational basis for the radionuclide release limits in the Limiting Conditions for Operation (LCO) and the Surveillance Requirement (SR) of this OSR.

Annual average measurements of stack effluents show that the concentration of long-lived gross beta activity is typically on the order of 100 times the long-lived gross alpha component. Measured effluent ratios of Sr-90 to Cs-137 are approximately 1:1; effluent ratios of Pu-239 to Am-241 are approximately 1:3. Using these data, gross beta activity is conservatively assumed to be 50 percent Sr-90 plus 50 percent Cs-137, and gross alpha activity is assumed to be 25 percent Pu-239 and 75 percent Am-241. The ventilation flow rates are not factors in the computer model.

The four radionuclides in the above ratios were input to the EPA-approved air dispersion and dose assessment code AIRDOS-PC (Version 3.0, 1990). One computer run was performed for the main plant stack using wind data collected during 1989 at the 60 meter elevation of the on-site meteorological tower. Another run was performed for all other stacks (assuming a 10 meter release height) using wind data collected at an elevation of 10 meters.

As determined from the AIRDOS-PC predictions and a survey of nearby residences, the maximally exposed off-site individual (for both elevated and ground-level releases) lives approximately 1900 meters NNW from the main plant stack.

The results from the computer runs were used to scale the radionuclide release rates so that the EDE to the maximally exposed resident from any stack or vent that requires monitoring would not exceed 10 percent of the limit (i.e., 1 mrem/year) if the LCOs were met. If, in the future, more than ten stacks (including the main plant stack) require monitoring, this limit on each stack will be revised to accommodate the additional stacks.

The administrative level of 1/12 mrem/month from any monitored stack or vent was obtained by reducing the 10 mrem/yr limit by a factor of 10 and dividing by 12 months. To obtain the monthly limits in SR Parts A and B, the release rate limits in LCO Parts A and B, respectively, were multiplied by the number of seconds in 30 days. Procedurally, action is required to investigate and report to management release levels at or above 75 percent of OSR limits (EM-11). In addition, monthly tracking of airborne releases is provided to site management.

ATTACHMENTS

None

REFERENCES

DOE/EP-0096, A Guide for Effluent Radiological Measurements at DOE Installations, 7/83.

DOE/EP-0023, A Guide for Environmental Radiological Surveillance at U.S. Department of Energy Installations, 7/81.

DOE Order 5400.5, Radiation Protection of the Public and the Environment, 2/90.

40 CFR 61, Subpart H, National Emission Standards for Emissions of Radionuclides other than Radon from Department of Energy Facilities.

DOE-ID Order 5400.1 General Environmental Protection Program, 8/12/91

Doc. Number OSR/GP-2

Revision Number 2

Revision Date 04/24/92

Engineering Release #1430
Per ECN #4227

West Valley Demonstration Project

OPERATIONAL SAFETY REQUIREMENTS

PREPARED BY	<u>D. R. Staffas</u> Cognizant Engineer	D. R. Staffas	Date	<u>1/20/88</u>
APPROVED BY	<u>C. J. Roberts</u> Cognizant Manager	C. J. Roberts	Date	<u>3/20/88</u>
APPROVED BY	<u>P. A. Humonney</u> Radiation & Safety Committee, Chairman	P. A. Humonney	Date	<u>5/20/88</u>
APPROVED BY	<u>D. L. Shugars</u> Quality Assurance	D. L. Shugars	Date	<u>5/20/88</u>
APPROVED BY	<u>R. F. Cassner</u> Waste Treatment Project	R. F. Cassner	Date	<u>5/23/88</u>
APPROVED BY	<u>J. L. Knabenschun</u> Radiological & Environmental Safety Manager	J. L. Knabenschun	Date	<u>5/20/88</u>
APPROVED BY	<u>R. E. Lawrence, Jr.</u> Supernatant Treatment Project Manager	R. E. Lawrence, Jr.	Date	<u>1/21/88</u>



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OSR:0001273.RM
WV-1816

DOE Approved: DW:92:0397
Dated 03/17/92

RECORD OF REVISION

PROCEDURE

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0	Original Issue	All	
1	Dated 5/20/88	All	
1	Engineering Release 1430	N/A	08/88
2	Per ECN #4227 Update references, clarifying language added, radiological concentrations adjusted to meet new DOE Order requirements, added a reporting requirement	All	04/24/92

RECORD OF REVISION (CONTINUATION SHEET)

<u>Rev. No.</u>	<u>Description of Changes</u>	<u>Revision On Page(s)</u>	<u>Dated</u>
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OPERATIONAL SAFETY REQUIREMENT GP-2

TITLE: Radioactivity Content of Liquid Effluents Released from WVDP

CRITERIA: 1. Release of radioactive liquid effluents shall not exceed limits established by DOE orders.

UNACCEPTABLE EVENTS: 1. Discharge of radioactive liquid effluent exceeding DCGs at the site boundary.

REPORTING REQUIREMENTS: For Operational Safety Requirement (OSR) violations, WV-987 "Initial Investigation, Oral Reporting, and Written Critique of Occurrences at WVNS" shall be followed.

Operational Safety Requirement GP-2	Page
Safety Limits (SLs)	1
Limiting Conditions for Operation (LCOs)	2
Surveillance Requirements (SRs)	3
Basis.	3

IMPLEMENTING PROCEDURES: SOP 15-1
EM-11
EM-101

OPERATIONAL SAFETY REQUIREMENT GP-2

TITLE: Radioactivity Content of Liquid Effluents Released from the WVDP

APPLICABILITY

This OSR establishes limits for the controlled discharge of radioactivity contained in liquid effluents released from the site.

OBJECTIVE

To provide reasonable assurance that concentrations of radioactivity deliberately released to the environment will meet the requirements of DOE Order 5400.5.

SPECIFICATION

SAFETY LIMIT

EFFECTIVE DOSE EQUIVALENT TO MAXIMALLY EXPOSED OFF-SITE INDIVIDUAL BY WATER PATHWAY SHALL BE LESS THAN 100 MREM/YEAR.

LIMITING CONDITIONS FOR OPERATION

1. LIQUID DISCHARGED TO THE ENVIRONMENT WITHOUT PASSING THROUGH A PERMITTED TREATMENT SYSTEM SHALL MEET ALL OF THE FOLLOWING CRITERIA:
 - > A. GROSS α ACTIVITY LESS THAN 3.0×10^{-8} $\mu\text{Ci/mL}$ ABOVE BACKGROUND
 - > B. GROSS β ACTIVITY LESS THAN 1.0×10^{-6} $\mu\text{Ci/mL}$ (NOT INCLUDING H-3) ABOVE BACKGROUND
 - > C. TRITIUM ACTIVITY LESS THAN 2×10^{-3} $\mu\text{Ci/mL}$ ABOVE BACKGROUND PROVIDED THAT THE SUM OF THE FRACTIONS OF A, B, AND C IS LESS THAN UNITY i.e., SO THAT:
$$\frac{\alpha \mu\text{Ci/mL}}{3.0 \times 10^{-8}} + \frac{\beta \mu\text{Ci/mL}}{1 \times 10^{-6}} + \frac{\text{H-3 } \mu\text{Ci/mL}}{2 \times 10^{-3}} \leq 1, \text{ AND}$$
 - > D. VOLUME RELEASED LESS THAN 10,000 GALLONS PER DAY.

2. ANNUAL AVERAGE CONCENTRATIONS OF RADIONUCLIDES IN ALL LIQUID DISCHARGED TO THE ENVIRONMENT, INCLUDING RELEASES FROM A PERMITTED TREATMENT SYSTEM, SHALL NOT EXCEED THE DOE DERIVED CONCENTRATION GUIDES (DCGs) AT SAMPLE LOCATION WNSP006 (THE POINT WHERE FRANK'S CREEK LEAVES THE FENCED SITE SECURITY AREA).

SURVEILLANCE REQUIREMENTS

- > 1. EACH BATCH OF LIQUID WHICH EXCEEDS THE CONDITIONS OF LCO NO. 1 SHALL BE SAMPLED AND ITS ISOTOPIC COMPOSITION SHALL BE MEASURED PRIOR TO INTENTIONAL DISCHARGE TO DETERMINE COMPLIANCE WITH LCO NO. 2. RESULTS OF THESE MEASUREMENTS SHALL BE REPORTED MONTHLY.
- > 2. ANNUAL AVERAGE RADIONUCLIDE CONCENTRATIONS AT SAMPLE LOCATION WNSP006 SHALL BE DETERMINED AND REPORTED IN THE ANNUAL SITE ENVIRONMENTAL REPORT.

BASIS

- > 1. DOE Order 5400.5 requires that an effluent monitoring system shall be in place for each effluent stream which has a reasonable probability of exceeding Derived Concentration Guides (DCG). Releases which may result in an annual dose commitment to any individual in the uncontrolled environment of greater than 10 mrem must be reported to DOE-HQ per DOE 5400.5. The concentrations listed under LCO NO. 1 correspond to the most restrictive of the DOE DCGs for radionuclides which might contribute a significant fraction of the total off-site radiation dose from liquids released from the WNDP site. The combination of the restricted gross alpha, beta, and tritium radioactivity concentrations and the limit on total released volume combined with the dilution which inevitably occurs before any effluents from the immediate Project site cross the boundary of the Western New York Nuclear Service Center, will ensure that the potential dose to an off-site individual from the fraction of site releases meeting LCO NO. 1 restrictions will be well below 1.0 mrem per year and is ALARA.
- > 2. Effluents which do not meet all of the criteria of LCO No. 1 must be sampled, analyzed, and reported monthly to ensure that annual average concentrations do not exceed the combined DCGs at the point where the discharge exits the site at the Project security fence, (WNSP006). This will ensure that the effective dose equivalent to an off-site individual will not exceed 100 mrem/year and will meet the requirements of DOE Order 5400.1 and DOE Order 5400.5. Confirming measurements at the exit sampling point (WNSP006) will be reported in the annual Site Environmental

Report. Prudent plant operation dictates that the quantity of radioactivity released to the environment be kept as low as reasonably achievable.

ATTACHMENTS

None

REFERENCES

- DOE/EP-0096, A Guide for Effluent Radiological Measurements at DOE Installations, 7/83.
- DOE/EP-0023, A Guide for Environmental Radiological Surveillance at U.S. Department of Energy Installation, 7/81.
- > DOE/EH-0173T, "Environmental Regulatory Guide for Radiological Effluent Monitoring and Environmental Surveillance", 1/91.
 - > U.S. DOE Order 5400.1, "General Environmental Protection Program", 11/88.
 - > U.S. DOE Order 5400.5, "Radiation Protection of the Public and the Environment", 2/90.
 - > Radiological Parameters for Assessment of West Valley Demonstration Project Activities, WVDP-65, Rev. 2, 10/90.
 - > U.S. DOE-ID Order 5404.1A, "Environmental Protection, Safety, and Health Protection Information Reporting Requirements," 8/82.