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VPNPD-96-024

10CFR50.4  
10CFR50.90

April 24, 1996

Document Control Desk  
U.S. NUCLEAR REGULATORY COMMISSION  
Mail Station P1-137  
Washington, DC 20555

Ladies and Gentlemen:

DOCKET 50-266 AND 50-301  
TECHNICAL SPECIFICATIONS CHANGE REQUEST 174  
GENERIC LETTER 89-01, GENERIC LETTER 95-10  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.4 and 50.90, Wisconsin Electric Power Company (Licensee) hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant (PBNP), Units 1 and 2, respectively, to incorporate changes to the PBNP Technical Specifications. The proposed changes remove from the PBNP Radiological Technical Specifications (RETS), Section 15.7, those items identified in Generic Letter (GL) 89-01 and in GL 95-10 as being procedural details and relocates the removed items to the appropriate documents. The changes for relocating the procedural details of the current PBNP RETS has been accomplished using the guidance of GL 89-01 and of GL 95-10 and in accordance with the proposed changes to the administrative controls section of the PBNP RETS so that the changes may be implemented immediately upon issuance of the proposed amendment.

In order to accomplish the transfer of items described in GL 89-01 and GL 95-01, the requested change creates two new programs: the Radiological Effluent Control Program (RECP) and the Radiological Effluent and Materials Control and Accountability Program (REMCAP). The RECP becomes the repository for RETS items concerning explosive gas and effluent sampling and control. The Process Control Program (PCP), Offsite Dose Calculation Manual (ODCM), Radiological Environmental Monitoring Program (REMP), and RECP become functional elements within the REMCAP. The REMCAP becomes the governing program that unites the PCP, REMP, ODCM, and RECP. The scope and the administrative controls for the REMCAP and its program elements are set forth in the administrative section of the modified RETS. Following the guidance of GL 89-01 and GL 95-10, the contents of RETS Sections 15.7.3, 15.7.4, 15.7.6 and 15.7.7 are transferred in their entirety. In RETS 15.7.5, only items concerning explosive gas concentration limits remain. All items in 15.7.5 concerning radiological effluents, except "equivalent curies" and the "tritium adjustment," are transferred to the RECP. The tritium adjustment and equivalent curies concepts have been replaced by dose calculations and therefore are eliminated now that they are no longer used. Except for the definition of equivalent curies, which is eliminated from the Technical Specifications (TS), most of the definitions in RETS 15.7.1

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In order to accomplish the transfer of items described in GL 89-01 and GL 95-01, the requested change creates two new programs: the Radiological Effluent Control Program (RECP) and the Radiological Effluent and Materials Control and Accountability Program (REMCAP). The RECP becomes the repository for RETS items concerning explosive gas and effluent sampling and control. The Process Control Program (PCP), Offsite Dose Calculation Manual (ODCM), Radiological Environmental Monitoring Program (REMP), and RECP become functional elements within the REMCAP. The REMCAP becomes the governing program that unites the PCP, REMP, ODCM, and RECP. The scope and the administrative controls for the REMCAP and its program elements are set forth in the administrative section of the modified RETS. Following the guidance of GL 89-01 and GL 95-10, the contents of RETS Sections 15.7.3, 15.7.4, 15.7.6 and 15.7.7 are transferred in their entirety. In RETS 15.7.5, only items concerning explosive gas concentration limits remain. All items in 15.7.5 concerning radiological effluents, except "equivalent curies" and the "tritium adjustment," are transferred to the RECP. The tritium adjustment and equivalent curies concepts have been replaced by dose calculations and therefore are eliminated now that they are no longer used. Except for the definition of equivalent curies, which is eliminated from the Technical Specifications (TS), most of the definitions in RETS 15.7.1

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are transferred to the appropriate manuals and the REMCAP definition is added. Changes to RETS 15.7.8, the administrative section, include the transfer of procedural details concerning the content of the Annual Monitoring Report and the addition of administrative controls for the REMCAP, its subprograms, and, pursuant to GL 95-10, explosive gas monitoring.

A complete and legible copy of each of the manuals, marked-up TS pages, a no significant hazards consideration, a safety evaluation, and a detailed list of changes to RETS for the disposition of the removed RETS items are enclosed.

The removal of procedural items from RETS necessitates minor changes to other PBNP TS because they reference the removed sections. Marked up copies of these TS pages also are provided.

#### DESCRIPTION OF THE CURRENT LICENSEE CONDITIONS: RETS

TS 15.7.1, "Definitions" contains the definitions of terminology used in RETS.

TS 15.7.2, "Site Description" contains the map of the site.

TS 15.7.3, "Radioactive Effluent Monitoring Instrumentation Operability Requirements" specifies the operability and alarm or trip setpoint requirements for liquid and gaseous effluent monitoring instrumentation.

TS 15.7.4, "Radioactive Effluent Monitoring Instrumentation Surveillance Requirements" specifies the periodic inspection, testing, calibration and verification of operability requirements for the liquid and gaseous effluent monitoring instrumentation.

TS 15.7.5, "Radioactive Effluent Release Limits" specifies the amount of radioactive effluent that can be released to unrestricted areas.

TS 15.7.6, "Radioactive Effluent Sampling and Analysis Requirements" specifies the sampling frequency, analysis frequency, and analysis requirements for radioactive liquid and gaseous effluents.

TS 15.7.7, "Operational Environmental Monitoring Program" specifies the sampling, analytical, and reporting requirements for the radiological environmental monitoring program.

TS 15.7.8, "Administrative Controls" specifies the administrative requirements necessary to accomplish the RETS management and reporting requirements.

#### DESCRIPTION OF THE CURRENT LICENSEE CONDITIONS: RETS AFFECTED ITEMS

TABLE OF CONTENTS contains the names of the TS sections.

TS 15.6.5.1.j and .k "Review and Audit, Manager's Supervisory Staff" specifies the items subject to review and audit by the Manager's Supervisory Staff.

TS 15.4.10 "Operational Environmental Monitoring" states where the environmental monitoring and effluent monitoring TS are located.

TABLE 15.4.1-1 "Minimum Frequencies for Checks, Calibrations, and Tests of Instrument Channels" specifies the frequency of checks, calibrations, and tests for various instruments.

TS 15.3.9 "Effluent Release" specifies where the effluent release limits are contained in the PBNP TS.

#### DESCRIPTION OF PROPOSED CHANGES TO RETS

TS 15.7.1, "Definitions" of LLD, source check, unrestricted area, gaseous effluent treatment system, and liquid radioactive effluent treatment system are transferred to the REMCAP Manual. The equivalent curie definition is eliminated because it is no longer used. Equivalent curies had been used to track compliance with release limits and now has been replaced by dose calculations. The definition of REMCAP is added. The exact location to which items were transferred is in the attached List of Changes to RETS (List).

TS 15.7.2, "Site Description" The site map is updated to show the location of the Independent Spent Fuel Storage Installation (ISFSI)

TS 15.7.3, "Radioactive Effluent Monitoring Instrumentation Operability Requirements." All material concerning radioactive effluent monitoring and explosive gas were transferred to the Radiological Effluent Control Program Manual (RECM). The location to which items were transferred is in the attached List.

TS 15.7.4, "Radioactive Effluent Monitoring Instrumentation Surveillance Requirements." Material concerning radioactive effluent monitoring and explosive gas instrumentation is transferred to the RECM. The exact location to which items were transferred is in the attached List.

TS 15.7.5, "Radioactive Effluent Release Limits" is retitled "Radioactive Effluent Release and Explosive Gas Concentration Limits." Information regarding radioactive release limits was transferred to the ODCM and to the RECM. Explosive gas concentration limits remain in this section and also were copied to the RECM. References to "equivalent curies" have been deleted because the equivalent curie methodology is no longer used. Also dropped is the "Tritium Adjustment" in 15.7.5.E which is no longer used. The exact location to which items were transferred is in the attached List.

TS 15.7.6, "Radioactive Effluent Sampling and Analysis Requirements" has been transferred in its entirety to Section 6 of the RECM. The exact location to which items were transferred is in the attached List.

TS 15.7.7, "Operational Environmental Monitoring Program" is transferred to the Environmental Manual (EM). Table 15.7.7-1 is eliminated and not transferred because the information on this table already exists in Tables 2-3, 2-4, and 2-5 and in Figures 2.1a and 2.1b of the EM. Because the EM already contained the information in TS 15.7.7 but using slightly different wording, only minor changes

were made to the EM. Therefore, the transfer of RETS 15.7.7 material to the EM is not a word-for-word transfer. The attached List indicates the section of the EM where the actions required by RETS 15.7.7 are located but stated in different words.

TS 15.7.8, "Administrative Controls" Revisions have been made and new material covering the REMCAP has been added. The detailed description of effluent monitoring results to be reported in the Annual Monitoring Report is transferred to the RECM. The exact location to which items were transferred is in the attached List.

As an aid for the PBNP reactor operators, the section titles remain in RETS and a statement is added to let the operators know the new location of the transferred information.

#### DESCRIPTION OF PROPOSED CHANGES TO RETS AFFECTED TS ITEMS

TS 15.6.5.1.j "Review and Audit, Manager's Supervisory Staff" is changed so that the new location for release limits, the Radiological Effluent Control Program, is referenced. Also, with the elimination of "equivalent curies" this section is augmented to specify the review of effluents exceeding annual release limits as well as releases which require a special report pursuant to TS 15.7.8.D.

TS 15.6.5.1.k is expanded to include all of the manuals to which RETS items are transferred. This change clarifies the MSS responsibilities with respect to the TS change and ensures that the same degree of review and approval is applied to all items transferred from RETS under the guidance of Generic Letter 89-01.

TS 15.4.10 "Operational Environmental Monitoring" is changed in three ways. First, the name has been changed to "Radiological Environmental Monitoring" to differentiate radiological monitoring from non-radiological environmental monitoring. Next, the reference to effluent sampling is eliminated because it is not environmental monitoring as defined in the Environmental Manual (EM). Finally, the reference to TS 15.7.7 is changed to the EM which is the new location for these former RETS items.

Footnote 7 of TABLE 15.4.1-1 "Minimum Frequencies for Checks, Calibrations, and Tests of Instrument Channels" is changed by replacing the reference to TS 15.7.4 with the reference to the Radiological Effluent Control Manual which is the new location for the material removed from TS 15.7.4.

TS 15.3.9 "Effluent Release" is expanded to include the mention of sampling and analysis which were removed from TS 15.4.10. Also, the old location of these requirements, TS 15.7.5, is updated to the new location, the Radiological Effluent Control Manual.

The section names in the Table of Contents are changed to reflect the proposed changes. The TS sections with name changes are 15.4.10 and 15.7.5. The new names are set forth in the above description of the requested changes.

## BASIS AND JUSTIFICATION

GL 89-01 suggests transferring procedural items from RETS to the ODCM or PCP. This Technical Specification Change Request accomplishes the transfer of these procedural elements in a non-standard manner. Note that Wisconsin Electric's ODCM already is non-standard because the Radiological Environmental Monitoring Program (REMP) is not physically contained within the ODCM. Instead, the REMP is located in the Environmental Manual (EM), a stand-alone document, incorporated into the ODCM by reference. In order to continue the approach of segregating procedures by subject matter, the programmatic entity called the Radiological Effluent Control Program (RECP) is created to contain those former RETS items governing effluents. Creating the RECP results in four, stand-alone program elements, the PCP, the ODCM, the REMP, and the RECP. Also created is an umbrella entity, the Radiological Effluent and Materials Control and Accountability Program (REMCAP) to govern and link the four programmatic elements. The administrative section of RETS is augmented with definitions for the new programs, with programmatic controls to ensure that the requirements of 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 are satisfied, with simplified administrative controls for changes to the REMCAP program elements, and with record retention requirements for program changes.

GL 95-10 allows transferring explosive gas instrumentation and procedural items in RETS to a document other than the suggested FSAR as long as the administrative program to control revisions is clearly described in the TS. Because the explosive gas monitoring instrumentation and surveillance requirements items were located in the RETS tables and sections governing instrumentation and surveillance of radiological effluent, the explosive gas requirements are transferred with the radiological items to the RECP as part of the same tables and sections they previously occupied. In order to assure that the appropriate controls are applied to revisions, the administrative section, 15.7.8, is augmented to require the 50.59 process for any revisions to explosive gas requirements.

Two RETS items are deleted, the "equivalent curie" and the "tritium adjustment." The equivalent curie methodology was one of the two methods specified in 15.7.6 for monitoring compliance with release limits; the other was dose calculation. The tritium adjustment was used with equivalent curies to allow for release adjustments between the liquid and atmospheric effluent pathways. The use of dose calculations for compliance with effluent release limits is more rigorous than the formerly used equivalent curies concept. Therefore, the deletion of the equivalent curie and tritium adjustment concepts does not diminish the ability to track and account for PBNP effluent.

The requested changes to the PBNP RETS are administrative. They do not decrease any of the controls and actions PBNP applies to monitor and control effluents and explosive gas, assess the impact of radioactive effluents, and solidify wastes. The requested changes merely transfer procedural details from RETS into various documents whereas the administrative controls remain in the TS. The procedural details are transferred to the program manual which best describes the function of the transferred item. Hence, effluent control is transferred to the RECP.

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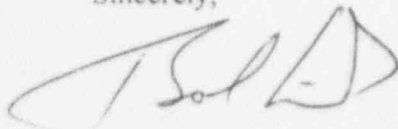
The requested changes to RETS necessitate minor changes to other TS which reference the RETS items by their old location. These TS changes are administrative and have no impact on plant operation. Similarly, the clarifications added to the RETS affected TS amplify the requirements already in the affected TS and therefore do not negatively impact PBNP operations.

We have determined that the proposed amendment request is administrative in nature. It does not involve a significant hazards consideration, authorize a significant change in the types or total amounts of any effluent release, or result in any significant increase in either individual or cumulative occupational and non-occupational exposures. Therefore, we conclude that the proposed amendment meets the requirements of 10 CFR 51.22(c)(9) and (10) and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared.

In summary, the proposed changes are administrative and do not change current effluent control and quantification procedures at the Point Beach Nuclear Plant. For this reason, we request that you process this change at your earliest opportunity.

Please contact us if you have any questions.

Sincerely,



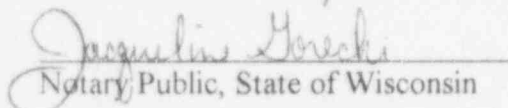
Bob Link  
Vice President  
Nuclear Power

Enclosures

KAJ

cc: NRC Resident Inspector  
NRC Regional Administrator, Region III  
Public Service Commission of Wisconsin

Subscribed and sworn before me on  
this 24<sup>th</sup> day of April 1996

  
Notary Public, State of Wisconsin

My commission expires 10-27-96

TECHNICAL SPECIFICATIONS CHANGE REQUEST 174  
SAFETY EVALUATION

INTRODUCTION

Wisconsin Electric Power Company (Licensee) is applying for amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2. The proposed changes modify current Sections 15.7.1 through 15.7.8 of RETS by transferring items, which Generic Letter (GL) 89-01 and GL 95-10 identify as procedural details, to the appropriate documents depending upon the subject of the item. With the transference of the RETS items, five (5) others sections of TS which reference the transferred items are changed to reflect the new location of these items.

EVALUATION

10 CFR 50.34a states that operations should be conducted so as to keep levels of radioactive material in effluents to unrestricted areas as low as reasonably achievable (ALARA). In 10 CFR 50, Appendix I, the NRC provides numerical values for what it considers to be the appropriate ALARA dose objectives to which the licensee's calculated effluent doses may be compared. These doses are a small fraction of the dose limits specified by 10 CFR 20.1301 and by 40 CFR 190. 10 CFR 20.1302 directs the licensee to make the appropriate surveys of radioactive materials in effluents released to unrestricted and controlled areas. This monitoring requirement (also found in General Design Criterion (GDC) 64 of Appendix A to 10 CFR 50, in Section IV.B.1 of Appendix I to 10 CFR 50, and in PBNP GDC 17) is implemented as required by PBNP GDC 70 and GDC 60 of Appendix A to 10 CFR 50. Control of solid waste materials is addressed by PBNP GDC 70 and GDC 60 of Appendix A to 10 CFR 50.

In order to confirm that the appropriate controls have been applied to effluents, 10 CFR 20.1302, PBNP GDC 17, GDC 64 of Appendix A to 10 CFR 50, and Section IV.B of Appendix I to 10 CFR 50 require the appropriate surveys and measurements be made of unrestricted areas in the PBNP environs. The surveys are to provide data on levels of radiation and radioactive materials in the environment in order to evaluate the relationship between quantities of radioactive material released in effluents and the resultant radiation doses to individuals from principle exposure pathways. The results of these measurements are sent to the NRC annually pursuant to 10 CFR 50.36a and must be sufficient to fulfill the objectives of Section IV.B of Appendix I to 10 CFR 50.

In order to assure that the waste gas system meets its design intent as required by 10 CFR 50.34a(c) and GDC 60 of Appendix A to 10 CFR 50, the current RETS contains specifications regarding explosive gas monitoring pursuant to the requirement of GDC 3 to Appendix A of 10 CFR 50 for a system to minimize the probability of an explosion which would result in a radioactive release. The NRC has concluded that the current explosive gas monitoring instrumentation and surveillance requirements in RETS do not conform to the 10 CFR 50.36 criteria for inclusion in TS. Therefore, the instrumentation and surveillance items for explosive gas monitoring in Tables 15.7.3-2 and 15.7.4-2 are transferred to the RECM with the radioactive effluent monitoring specifications.

This technical specification change request does not relieve PBNP of performing the current procedures which are implemented to accomplish the monitoring required by the above regulations and by the current RETS. Current effluent controls, explosive gas monitoring activities, solidifications, dose calculations, and environmental monitoring activities will continue. The requested change merely removes procedural details from RETS and transfers them to the appropriate manuals. The administrative requirements and controls for these items remain in RETS and are enhanced by the addition of controls for the two new programs as well as the addition of record retention requirements for changes to the REMCAP elements. These changes follow the intent of the guidance provided by GL 89-01 and GL 95-10 for the removal of procedural details and for the inclusion of administrative controls.

CONCLUSION

In summary, the proposed administrative revisions streamline RETS without affecting the safe operation of PBNP.



**TECHNICAL SPECIFICATIONS CHANGE REQUEST 174**  
**NO SIGNIFICANT HAZARDS CONSIDERATIONS**

As required by 10 CFR 50.91(a), Wisconsin Electric Power Company (Licensee) has evaluated the proposed changes against the standards of 10CFR50.92(c) and has determined that the operation of Point Beach Nuclear Plant, Units 1 and 2, in accordance with the proposed amendments, does not present a significant hazards consideration.

Operation of the facility in accordance with the proposed license amendment does not present a significant hazards consideration based on the analyses presented below:

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed amendment simplifies the RETS and implements the recommendations of GL 89-01 and of GL 95-10. The proposed change relocates the operational requirements of RETS but keeps the programmatic controls for these requirements in the Technical Specifications. Therefore, the proposed changes are administrative in nature and do not affect plant operations. Hence, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because no safety-related equipment, safety function, or plant operation will be altered as a result of this proposed change. Also, the changes are unrelated to the initiation and mitigation of accidents and equipment malfunctions addressed in the Final Safety Analysis Report.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated.

As stated above, the proposed action is the relocation of the RETS procedural details to various manuals while retaining the administrative controls in RETS. The relocation is consistent with the intent of the guidance of GL 89-01 and of GL 95-10. It is administrative and has no impact on plant operation or safety. No safety-related equipment, safety function, or plant operation will be altered as a result of this proposed change. No changes to plant components or structures are introduced which could create new accidents or malfunctions not previously evaluated.

Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated because no new accident scenario is created and no previously evaluated accident scenario is changed by the relocation of the procedural details of RETS from one controlled document to another.

3. Does the proposed amendment involve a significant reduction in the margin of safety.

The proposed change does not include a change to any plant structure, system, component, or operation. The proposed changes do not alter the basic regulatory requirements and do not affect any safety analyses. The proposed change is administrative. The procedural details of the current RETS are relocated while the programmatic controls consistent with regulatory requirements, including controls on revisions to the manuals receiving the RETS procedural details, the EM, Radiological Effluent Control Program Manual (RECM), ODCM, and PCP, remain in RETS.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

## LIST OF CHANGES TO RETS

1. 15.7.1 Definitions
  - A. Equivalent Curie - deleted, concept no longer used
  - B. LLD - transferred to Environmental Manual 2.2.3 and to REMCAP 1.2.1
  - C. relabeled as item A and repeated in REMCAP 1.2.2
  - D. relabeled as item B and repeated in REMCAP 1.2.3 and new item D inserted
  - E. relabeled as item C and repeated in REMCAP 1.2.4 & 1.2.5
  - F. transferred to the Radiological Effluent Control Program Manual (RECM) 4.3.1
  - G. transferred to REMCAP 1.2.6
  - H. transferred to RECM 2.2
  - I. transferred to RECM 2.1
2. 15.7.2 The map has been updated to show the location of the Independent Spent Fuel Storage Installation (ISFSI).
3. 15.7.3. Radioactive Effluent Monitoring Instrumentation
  - Objective transferred to RECM 3.1
  - 15.7.3.A & B Combined and transferred to RECM 3.2.
  - TABLE 15.7.3-1 transferred to RECM table 3-1.
  - TABLE 15.7.3-2 transferred to RECM Table 3-2.
  - Notations for Tables 15.7.3-1 and 3-2 transferred to RECM  
"Notations for Tables 3-1 and 3-2."
4. 15.7.4 Radioactive Effluent Monitoring Instrumentation Surveillance Requirements
  - Objective transferred to RECM 4.1
  - 15.7.4.A transferred to RECM 4.2.
  - 15.7.4.B transferred to RECM 4.2
  - Table 15.7.4-1 transferred to RECM Table 4-1
  - Table 15.7.4-4 transferred to RECM Table 4-2,
  - Notations for Tables 15.7.4-1 and 4-2 transferred to RECM  
"Notations for Tables 4-1 and 4-2"
5. 15.7.5 "Radioactive...Limits" retitled "Radioactive... and Explosive Gas Concentration Limits."
  - "Objective" copied to RECM 5.1 and the RETS copy modified for explosive gas.
  - 15.7.5.A.1 - A.3 transferred to RECM 5.2.1 - 5.2.3.
  - 15.7.5.B.1 - B.3 a transferred to RECM 5.3.1 - 5.3.3. and similar information is found in ODCM 4.2.1
  - 15.7.5.B.3.b and following paragraph eliminated because equivalent curies are no longer used now that effluent doses are calculated.
  - 15.7.5.C.1-C.3 transferred to RECM 5.4.1-5.4.3
  - 15.7.5.D.1 transferred to RECM 5.5.1
  - 15.7.5.D.1.a transferred to RECM 5.5.1.a
  - 15.7.5.D.1.b transferred to RECM 5.5.1.b
  - 15.7.5.D.2 transferred to RECM 5.5.2
  - 15.7.5.D.3-3a transferred to RECM 5.5.3 with 15.7.5.D.3.b and the following paragraph deleted because equivalent curies no longer used
  - 15.7.5.E deleted because tritium adjustment no longer used with dose calculations. The tritium adjustment is based on equivalent curies.
  - 15.7.5.F transferred to RECM 5.6
  - 15.7.5.G transferred to RECM 5.7
  - 15.7.5.H transferred to RECM 5.8
  - 15.7.5.I copied to RECM 5.9 and maintained in RETS but relabeled as 15.7.5.A

15.7.5.J transferred to RECM 5.10

15.7.5 Basis transferred to RECM 1.2. References to actions requiring use of equivalent curie methodology are deleted. The basis has been expanded to be more descriptive of RECM Section 5.

6. 15.7.6 "...Sampling and Analysis..." Whole section transferred to the RECM as indicated below:

"Objectives" transferred to RECM 6.1

15.7.6.A transferred to RECM 6.2

15.7.6.B transferred to RECM 6.3

Table 15.7.6-1 and Notes transferred to RECM Table 6-1 and Notes

Table 15.7.6-2 and Notes transferred to RECM Table 6.2 and Notes

7. 15.7.7 "...Environmental Monitoring..." Whole section is removed and material is located in the Environmental Manual (EM). Because the EM already contained most of the information in RETS 15.7.7 but in different words, RETS 15.7.7 was not transferred verbatim to the EM. Instead, listed below are the locations where the indicated RETS items are already located in the EM. The basis statement was transferred to the EM almost verbatim.

15.7.7 Objective located in EM 2.1.1

15.7.7.A.1 located in EM 2.2.5 and 2.2.6

15.7.7.A.2 located in EM 1.2.1.f.1(b) and 2.2.6

15.7.7.A.3 located in EM 2.2.5

15.7.7.B located in EM 2.2.3

15.7.7.C.1 & C.2 located in EM 2.2.4

15.7.7.C.3 located in EM 1.2.1.f.1(a)

15.7.7.D located in EM 2.5

15.7.7.E located in EM 2.2.10 and 1.2.1.f.1(e)

15.7.7 Basis transferred to EM 1.1.2

Table 15.7.7-1 deleted because the information already exists in EM Tables 2-3, 2-4, and 2-5 and in Figures 2.1a and 2.1b

Table 15.7.7-2 located in EM Table 2-2

Notes for Table 15.7.7-2, Items 2 - 4 located in EM Table 2-2

Notes for Table 15.7.7-2, Item 1 located in EM 2.2.9

Table 15.7.7-3 located in EM Table 2-2

8. 15.7.8 Administrative Controls

15.7.8.2.A is expanded by combining with B

15.7.8.2.B this material is incorporated with 15.7.8.2.A and 15.7.8.2.B is eliminated

15.7.8.2.C minor changes made to reflect the incorporation of the former B into A and section is renumbered 15.7.8.2.B

15.7.8.3 the current wording rewritten and expanded.

15.7.8.4.A.1 is completely rewritten

15.7.8.4.A.1.a-c transferred to RECM 1.5.1 - 1.5.3.

15.7.8.4.A.3 "Environmental Monitoring" is relabeled "REMP" and rewritten. Current Sections 15.7.8.4.A.3.a and .b are transferred to EM 1.2.1.f and rewritten.

15.7.8.4.A.6 "ODCM and PCP Changes" changed to "REMCAP Changes" and rewritten. The rewrite transfers the new revision specification to a new section 15.7.8.7, where the specifications for revisions are expanded.

15.7.8.4.A.7.a copied to RECM 1.5.5.

15.7.8.4.A.7.b copied to EM 1.2.1.f.1(d)

15.7.8.4.A.7.c copied to EM 1.2.1.f.1(e)

15.7.8.4.B changed reference from RETS to new location for Notification Levels

15.7.8.4.C - D combined as 15.7.8.4.C and also copied to RECM 1.6.1.

15.7.8.4.E copied to RECM 1.6.2. and relabeled 15.7.8.4.D

15.7.8.5 copied to RECM 1.6.3.

New sections 15.7.8.6 "Record Retention" and 15.7.8.7 "Revisions" added.