

Attachment 2
Proposed Changes

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measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

3) The principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 for gaseous emissions and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Semi-annual Radioactive Effluent Release Report pursuant to Specification 7.5.1.e.

c) All liquid effluent releases from the radioactive liquid waste holdup system shall be continuously monitored by two gamma activity monitors and their associated recorder. Equipment shall be operable to automatically terminate the release on high specific gamma activity or low cooling water blowdown flow and give a Control Room alarm.

| d) If one or both of the two gamma activity monitors become inoperable, liquid effluent releases may continue, provided that prior to initiating the release, at least two technically qualified members of the facility staff independently verify the release rate calculations and discharge valve lineup. With one or more of the radioactive liquid effluent monitoring instruments inoperable, best efforts shall be exerted to return the instruments to operable status within thirty days, and if unsuccessful, the failure to correct the inoperability in a timely fashion shall be explained in the next Semi-annual Radioactive Effluent Release Report.

| e) If the recorder associated with the two gamma activity monitors becomes inoperable, liquid effluent releases may continue, provided the count rate of each operable monitor is recorded at least once per four hours during actual releases.

Best efforts shall be exerted to return the recorder to operable status within thirty days, and if unsuccessful, the failure to correct the inoperability in a timely fashion shall be explained in the next Semi-annual Radioactive Effluent Release Report.

Specification ESR 8.1.2 - Radioactive Liquid Effluent,
Surveillance Requirements

- a) The level alarms and pump interlocks on the two liquid waste receiver tanks and monitoring tank shall be tested once per year.
- b) The liquid effluent discharge blocking valve shall be functionally tested prior to each release or once a month, whichever is more frequent.
- c) The gamma activity monitors of the liquid effluent discharge line and the Gas Waste Compressor Cooling Water System, and the low cooling water blowdown flow switch shall be functionally tested quarterly. The liquid effluent gamma activity monitors shall be source checked prior to each release; channel checked during each release, and calibrated once per 18 months and following maintenance on the detector system. The Gas Waste Compressor Cooling Water System Monitors shall be channel checked weekly, source checked monthly, and calibrated once per 18 months and following maintenance on the detector system.
- d) Flow rate monitors and gamma activity recorders shall be channel checked during each release, functionally tested quarterly, and calibrated once per 18 months.

NOTE: The channel functional test shall also demonstrate that Control Room alarm annunciation occurs if any of the following conditions exists:

1. Instrument indicates measured levels above the alarm setpoint.

Specification ELC0 8.1.3 - Reactor Building Sump Effluent,
Limiting Conditions for Operation

- a) The discharge from the Reactor Building sump pumps shall be continuously sampled, filtered, and the flow limited to less than or equal to 10 gallons per minute when operated in the automatic mode. An analysis shall be performed as soon as practical on the samples as described in ELC0 8.1.2.b).
- b) If effluent discharges from the Reactor Building sump at flow rates greater than 10 gallons per minute are to be made, two grab samples shall be taken and analyzed per ELC0 8.1.2.b) prior to the start of the discharge. During the discharge, the pump outlet shall be continuously sampled. An analysis shall be performed as soon as practical on the sample per ELC0 8.1.2.b).
- c) Effluent discharge from the Reactor Building sump shall not occur simultaneously with discharge from the radioactive liquid waste system.
- d) All liquid effluent releases from the Reactor Building sump shall be continuously monitored by two gamma activity monitors and their associated recorder. Equipment shall be operable to automatically terminate the release on high specific gamma activity or low cooling water blowdown flow.

| e) If one or both of the two gamma activity monitors become inoperable, liquid effluent releases may continue, provided that grab samples are taken every 12 hours and analyzed for principal gamma emitters, I-131, and tritium. With one or more of the radioactive liquid effluent gamma monitoring instruments inoperable, best efforts shall be exerted to return the instruments to operable status within thirty days and, if unsuccessful, the failure to correct the inoperability in a timely fashion shall be explained in the next Semi-annual Radioactive Effluent Release Report.

| f) If the recorder associated with the two gamma activity monitors becomes inoperable, liquid effluent releases may continue, provided the count rate of each operable monitor is recorded at least once per four hours during actual releases.

Best efforts shall be exerted to return the recorder to operable status within thirty days, and if unsuccessful, the failure to correct the inoperability in a timely fashion shall be explained in the next Semi-annual Radioactive Effluent Release Report.

g) If the blowdown flow measuring device becomes inoperable, liquid effluent releases may continue,

ATTACHMENT 3

SIGNIFICANT HAZARDS
CONSIDERATIONS

SIGNIFICANT HAZARDS

CONSIDERATIONS ANALYSIS

Since the proposed changes to the Fort St. Vrain Technical Specifications serves only to enhance the clarity of which type of activity will be continuously monitored during liquid effluent releases, no significant safety hazard considerations are involved.

Based on the above, operation of Fort St. Vrain in accordance with the proposed changes will not; (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

